

DECLARATION OF THERESA RIDDER

PURSUANT TO 28 U.S.C. § 1746

I, Theresa Ridder, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify as follows:

1. I am a citizen of the United States and am over eighteen (18) years of age. I am an employee of the Consumer Financial Protection Bureau (“CFPB” or “Bureau”). I am a Senior Investigator working in the Office of Enforcement in the Bureau’s office in Washington, D.C. As an employee of the Bureau, my current duties include: conducting financial and data analysis for investigations and litigation, conducting consumer and former employee interviews, and preparing summary fact declarations for investigations. I have been an employee of the Bureau since December 2013.

2. As part of my job, I research and investigate persons and entities that may be violating the Consumer Financial Protection Act and other statutes enforced by the Bureau. I was assigned to work on the Bureau’s investigation of Strategic Financial Solutions, LLC that led to the lawsuit against the following entities:

Corporate Defendants

- Strategic Family, Inc.;
- StratFS, LLC (f/k/a Strategic Financial Solutions, LLC);
- Strategic Client Support, LLC (f/k/a Pioneer Client Services, LLC);
- Strategic CS, LLC;
- Strategic FS Buffalo, LLC;
- Strategic NYC, LLC;
- BCF Capital, LLC;
- T Fin, LLC;

- Strategic Consulting, LLC (f/k/a Consult America, LLC);
- Versara Lending, LLC (f/k/a Fusion Processing, LLC);
- Anchor Client Services, LLC (now known as CS 1 PaaS Services, LLC);
- Bedrock Client Services, LLC (f/k/a HCS, LLC);
- Boulder Client Services, LLC;
- Canyon Client Services, LLC;
- Carolina Client Services, LLC;
- Great Lakes Client Services, LLC;
- Guidestone Client Services, LLC;
- Harbor Client Services, LLC;
- Heartland Client Services, LLC;
- Monarch Client Services, LLC (now known as CS 2 PaaS Services, LLC);
- Newport Client Services, LLC;
- Northstar Client Services, LLC;
- Option 1 Client Services, LLC;
- Pioneer Client Servicing, LLC (f/k/a Strategic Financial Solutions, LLC);
- Rockwell Client Services, LLC;
- Royal Client Services, LLC;
- Stonepoint Client Services, LLC;
- Summit Client Services, LLC (now known as CS 3 PaaS Services, LLC);
- Whitestone Client Services, LLC (collectively, “Corporate Defendants”);

Individual Defendants

- Ryan Sasson;

- Jason Blust (collectively, together with Corporate Defendants, “Defendants”);

Relief Defendants

- Daniel Blumkin;
- Albert Ian Behar;
- Strategic ESOP;
- Strategic ESOT;
- Twist Financial, LLC;
- Duke Enterprises, LLC;
- Blaise Investments, LLC;
- The Blust Family Irrevocable Trust, through Donald J Holmgren, Trustee;
- Jaclyn Blust;
- Lit Def Strategies, LLC; and
- Relialit, LLC (collectively, “Relief Defendants”).

3. Collectively, Strategic Family, Inc., StratFS, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC (f/k/a Pioneer Client Services, LLC), Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital, LLC, T Fin, LLC, Strategic Consulting, LLC (f/k/a Consult America, LLC), and Versara Lending, LLC (f/k/a Fusion Processing, LLC) are herein referred to as “SFS.”

4. Collectively, Anchor Client Services, LLC (now known as CS 1 PaaS Services, LLC), Bedrock Client Services, LLC (f/k/a HCS, LLC), Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client

Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC (now known as CS 2 PaaS Services, LLC), Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC (f/k/a Strategic Financial Solutions, LLC), Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC (now known as CS 3 PaaS Services, LLC), and Whitestone Client Services, LLC are herein referred to as the “Client Services Subsidiaries.”

5. SFS and Client Services Subsidiaries, as defined above, are referred to collectively as “Corporate Defendants.” Ryan Sasson and Jason Blust are referred to collectively as “Individual Defendants.” And the Corporate Defendants with the Individual Defendants are referred to collectively as “Defendants.”

6. Defendants partner with purported law firms around the country to offer debt-relief services to consumers. These firms are not named as defendants in Plaintiffs’ action. They are referred to herein as “Façade Firms” because most or all of the debt-relief services are carried out by non-attorneys who are not members of the firm. The Façade Firms include the following:

- A. Florio & Associates, PLLC d/b/a Bedrock Legal Group f/k/a Raggio & Associates, PLLC;
- Anchor Law Firm, PLLC;
- Boulder Legal Group, LLC;
- The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group;
- Burnette Legal Group, LLC d/b/a Monarch Legal Group;

- Daniel Rufty Legal, PLLC d/b/a Carolina Legal Services;
- Donald Norris Associates, PLLC d/b/a Stonepoint Legal Group;
- Gardner Legal LLC d/b/a Option 1 Legal;
- Great Lakes Law Firm, LLC;
- Greene Legal Group LLC d/b/a Newport Legal Group;
- Harbor Legal Group, LLC;
- Henry Legal Group, PLLC d/b/a Heartland Legal Group;
- Hodyno & Associates, PLLC d/b/a Rockwell Legal Group;
- JMS Industries, LLC d/b/a Canyon Legal Group, LLC;
- Pioneer Law Firm, P.C., f/k/a John B. Dougherty P.C.;
- Northstar Legal Group, LLC;
- Royal Legal Group, LLC;
- The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Legal Group; and
- WyoLaw, LLC d/b/a Summit Law Firm.

7. As part of my work on this matter, I:

- a. analyzed and reviewed records maintained by financial institutions, including KeyBank National Association (KeyBank), Bank of America, National Association (Bank of America), Associated Bank, National Association (Associated Bank), JPMorgan Chase Bank, N.A. (JPMorgan Chase), and Bank Leumi USA, acquired by Valley National Bank on April 1, 2022 (Valley Bank);

- b. reviewed records maintained by third-party payment processors used by the Defendants to process payment for consumers, including records from RAM Payment, LLC (formerly, Reliant Account Management, LLC) (RAM) and Global Client Solutions, LLC (a/k/a Global Holdings, Inc. or Global);
- c. searched and reviewed public records, databases, websites, and consumer complaints;
- d. reviewed documents responsive to Civil Investigative Demands (CIDs) regarding the Defendants;
- e. reviewed documents responsive to requests made to certain State Attorney Generals' Offices;
- f. reviewed enforcement proceedings and litigation related to the Defendants; and
- g. reviewed phone calls and phone call transcripts.

SFS Entities

8. During the Bureau's investigation, which is outlined in this declaration and its attached exhibits, I requested and reviewed charter documents related to the Corporate Defendants.

9. Attached to this declaration as **Exhibit 1** are true and correct copies of the charter documents for the Corporate Defendants, which I requested from the State of Delaware on October 18, 2023. The charter documents provide as follows:

- a. **Strategic Family, Inc.** is a Delaware corporation established on October 31, 2017. On or about January 8, 2019, the company filed a Certificate of Change of Registered Agent and/or Registered Office, and Ryan Sasson signed the certificate as the authorized officer;
- b. **StratFS, LLC** is a Delaware limited liability company organized on October 8, 2010, as Encore Capital USA, LLC. On or about April 13, 2015, Encore Capital USA, LLC filed a Certificate of Amendment to the Certificate of Formation to change the company's name to Strategic Financial Solutions, LLC. On or about December 27, 2017, Strategic Financial Solutions, LLC filed a Certificate of Merger with the State of Delaware, Secretary of State, Division of Corporation. The Certificate of Merger provided that Strategic Financial Solutions, LLC, the surviving entity, merged with Strategic Financial Merger Sub, Inc. Further, the Agreement of Merger is on file at 711 Third Avenue, New York, New York 10017, which is listed as the place of business of the surviving company, according to the Certificate of Merger. The Certificate of Merger identifies Ryan Sasson, Chief Executive Officer, as the authorized person who signed the document. On or about September 20, 2021, Strategic Financial Solutions, LLC filed another Certificate of Amendment to the Certificate of Formation to change the company's name to SFS DS, LLC. On or about September 28, 2021, SFS DS, LLC filed a Certificate of Amendment to the Certificate of Formation to change the company's name to StratFS, LLC;

- c. **Strategic Client Support, LLC** is a Delaware limited liability company organized on February 21, 2013, as Pioneer Client Services, LLC. On or about April 13, 2015, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to Strategic Client Support, LLC;
- d. **Strategic CS, LLC** is a Delaware limited liability company organized on April 26, 2013;
- e. **Strategic FS Buffalo, LLC** is a Delaware limited liability company organized on March 28, 2017;
- f. **Strategic NYC, LLC** is a Delaware limited liability company organized on June 13, 2017;
- g. **BCF Capital, LLC** is a Delaware limited liability company organized on February 22, 2012;
- h. **T Fin, LLC** is a Delaware limited liability company organized on October 2, 2014;
- i. **Strategic Consulting, LLC** is a Delaware limited liability company organized on August 28, 2012, as Consult America, LLC. On or about May 9, 2013, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to Strategic Consulting, LLC;
- j. **Versara Lending, LLC** is a Delaware limited liability company organized on October 25, 2011, as Fusion Processing, LLC. On or about April 29, 2016, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to Versara

Lending, LLC. Ryan Sasson signed Certificate of Amendment as the authorized person;

- k. **Anchor Client Services, LLC** (now known as CS 1 PaaS Services, LLC) is a Delaware limited liability company organized on January 5, 2016. On or about September 28, 2023, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to CS 1 PaaS Services, LLC;
- l. **Bedrock Client Services, LLC** is a Delaware limited liability company organized on October 7, 2014, as HCS, LLC. On or about January 3, 2017, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to Bedrock Client Services, LLC;
- m. **Boulder Client Services, LLC** is a Delaware limited liability company organized on January 5, 2016;
- n. **Canyon Client Services, LLC** is a Delaware limited liability company organized on January 22, 2018;
- o. **Carolina Client Services, LLC** is a Delaware limited liability company organized on April 18, 2018;
- p. **Great Lakes Client Services, LLC** is a Delaware limited liability company organized on April 18, 2018;
- q. **Guidestone Client Services, LLC** is a Delaware limited liability company organized on November 11, 2020;

- r. **Harbor Client Services, LLC** is a Delaware limited liability company organized on October 7, 2014;
- s. **Heartland Client Services, LLC** is a Delaware limited liability company organized on June 13, 2018;
- t. **Monarch Client Services, LLC** (now known as CS 2 PaaS Services, LLC) is a Delaware limited liability company organized on October 24, 2019. On or about October 25, 2019, the company filed a Certificate of Merger with the State of Delaware, Secretary of State, Division of Corporation. The Certificate of Merger provided that Monarch Client Services, LLC, the surviving entity organized in Delaware, merged with a New York limited liability company with the same name, Monarch Client Services, LLC. Further, according to the Certificate of Merger, the Agreement of Merger is on file at 711 Third Avenue, New York, New York 10017, which is listed as the place of business of the surviving company. The Certificate of Merger identifies Ryan Sasson, Chief Executive Officer, as the authorized person who signed the document. On or about September 28, 2023, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to CS 2 PaaS Services, LLC;
- u. **Newport Client Services, LLC** is a Delaware limited liability company organized on May 12, 2020;
- v. **Northstar Client Services, LLC** is a Delaware limited liability company organized on October 24, 2019. On or about October 25, 2019, the company filed a Certificate of Merger with the State of

Delaware, Secretary of State, Division of Corporation. The Certificate of Merger provided that Northstar Client Services, LLC, the surviving entity organized in Delaware, merged with a New York limited liability company with the same name, Northstar Client Services, LLC.

Further, according to the Certificate of Merger, the Agreement of Merger is on file at 711 Third Avenue, New York, New York 10017, which is listed as the place of business of the surviving company. The Certificate of Merger identifies Ryan Sasson, Chief Executive Officer, as the authorized person who signed the document;

- w. **Option 1 Client Services, LLC** is a Delaware limited liability company organized on October 24, 2019. On or about October 25, 2019, the company filed a Certificate of Merger with the State of Delaware, Secretary of State, Division of Corporation. The Certificate of Merger provided that Option 1 Client Services, LLC, the surviving entity organized in Delaware, merged with a New York limited liability company with the same name, Option 1 Client Services, LLC. Further, according to the Certificate of Merger, the Agreement of Merger is on file at 711 Third Avenue, New York, New York 10017, which is listed as the place of business of the surviving company. The Certificate of Merger identifies Ryan Sasson, Chief Executive Officer, as the authorized person who signed the document;
- x. **Pioneer Client Servicing, LLC** is a Delaware limited liability company organized on March 4, 2015, as Strategic Financial Solutions, LLC. On or about April 13, 2015, the company filed a

Certificate of Amendment to the Certificate of Formation to change the company's name to Strategic Client Group, LLC. On or about July 6, 2015, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to Pioneer Client Servicing, LLC;

- y. **Rockwell Client Services, LLC** is a Delaware limited liability company organized on August 9, 2017;
- z. **Royal Client Services, LLC** is a Delaware limited liability company organized on January 24, 2017;
- aa. **Stonepoint Client Services, LLC** is a Delaware limited liability company organized on August 9, 2017;
- bb. **Summit Client Services, LLC** is a Delaware limited liability company organized on April 18, 2018. On or about September 28, 2023, the company filed a Certificate of Amendment to the Certificate of Formation to change the company's name to CS 3 PaaS Services, LLC; and
- cc. **Whitestone Client Services, LLC** is a Delaware limited liability company organized on September 11, 2018.

10. On December 21, 2023, I requested from the State of Delaware, Secretary of State Office, the status of all the companies listed above in paragraphs 5(a) through 5(cc). The status of all the companies is "Good Standing." (Exhibit 1.)

The Corporate Defendants operate as a common enterprise

11. During the Bureau's investigation, which is outlined in this declaration and its attached exhibits, I learned that the Corporate Defendants operate through interrelated companies. For example:

- a. Corporate Defendants and Relief Defendants provided documents and information to financial institutions that show the interrelated nature of the companies.
 - Records from Valley Bank show Strategic Financial Solutions, LLC as the sole member of Anchor Client Service, LLC. The Valley Bank records include a document titled Limited Liability Company Operating Agreement, Anchor Client Services, LLC (Anchor Operating Agreement). The Anchor Operating Agreement defines "Sole Member" to mean "Strategic Financial Solutions, LLC" (Exhibit 4, pp. 49-53).
 - Records from KeyBank show the structure of Strategic Family, Inc., as of January 1, 2017, in the form of an organizational chart, which shows some of the Client Services Subsidiaries as subsidiaries of Strategic Family, Inc. (Exhibit 2, p. 15). A substantially similar organizational chart was produced in a lawsuit filed in 2022, *StratFS, LLC v. Starr Indem. & Liab. Co.*, 811963/2022 (Erie Cnty. Sup. Ct.), which showed additional Client Services Subsidiaries, including Carolina Client Services, LLC, Summit Client Services, LLC, Great Lakes Client Services, LLC, and Heartland Client Services, LLC (Exhibit 28).

- Records from Bank of America include tax records from 2018 for Strategic Family, Inc., which show Strategic Financial Solutions, LLC, as well as some of the Client Services Subsidiaries, as subsidiaries of Strategic Family, Inc. (Exhibit 3, pp. 1-7).
- Records from KeyBank include a Term Note dated October 31, 2019, with a Third Amendment Agreement dated June 15, 2020, that lists all SFS Defendants and many of the Client Services Subsidiaries as subsidiaries of Strategic Financial Solutions, LLC. (Exhibit 2, pp. 1-27)

Table 1 provides a representation of the company's organizational structure over time, based on the KeyBank and Bank of America productions. Excerpts of some of these records are provided in Exhibits 2 and 3.

- b. Records from Global, obtained by the North Carolina Attorney General's Office, show that Strategic Financial Solutions, LLC was an owner of certain Client Services Subsidiaries. For example:
 - Global document titled Affiliate Company Information and Authorization for Summit Client Services, LLC shows Strategic Financial Solutions, LLC as a 100% owner of Summit Client Services, LLC, and lists Ryan Sasson as the Chief Executive Officer of the company. (Exhibit 5, pp. 32-33.)
 - Global also obtained corporate records for some of the Client Services Subsidiaries. The corporate records for Carolina Client Services, LLC show Strategic Financial Solutions, LLC as an initial member of the company. (Exhibit 5, p. 37.)

- c. I reviewed documents that were filed in federal court related to some of the Corporate Defendants. In these documents, Ryan Sasson signed a declaration, (Sasson Declaration) as Exhibit #1 to the Defendant StratFS, LLC's Motion to Dismiss, dated and entered on November 7, 2022, as part of Briggs v. Strategic Financial Solutions, LLC, No. 22-cv-03705 (N.D. Ill.). This declaration explains that StratFS, LLC and Versara Lending, LLC have common ownership but are separate entities. (Exhibit 6, p. 16.)
- d. In the same Sasson Declaration, Sasson admitted that Monarch Client Services, LLC is a subsidiary of StratFS, LLC. Sasson stated, "Monarch [Client Services, LLC] provides non-legal and administrative support services to Monarch Legal Group." (Exhibit 6, p. 16.)
- e. Most of the Corporate Defendants used the 711 Third Avenue, 6th Floor, New York, New York 10017 address.
 - A November 10, 2020, UCC filing concerning Strategic Family, Inc. filed with the State of Delaware (UCC Financing Statement) (Exhibit 7.) lists 711 Third Ave, 6th Floor, New York, New York 10017 as the mailing address for some of the Corporate Defendants and the following Client Services Subsidiaries:
 - Anchor Client Services, LLC;
 - Bedrock Client Services, LLC;
 - Boulder Client Services, LLC;
 - Canyon Client Services, LLC;
 - Carolina Client Services, LLC;

- Great Lakes Client Services, LLC;
- Harbor Client Services, LLC;
- Heartland Client Services, LLC;
- Monarch Client Services, LLC;
- Northstar Client Services, LLC;
- Option 1 Client Services, LLC;
- Pioneer Client Servicing, LLC;
- Rockwell Client Services, LLC;
- Royal Client Services, LLC;
- Stonepoint Client Services, LLC;
- Summit Client Services, LLC; and
- Whitestone Client Services, LLC.

(Exhibit 7, pp. 4-11.)

- Records from Bank of America include 2018 tax documents for Twist Financial, LLC. In the documents attached to the 2018 Schedule K-1 IRS for Twist Financial, LLC, many of the Corporate Defendants have addresses at 711 Third Avenue, 6th Floor, New York, New York 10017. (Exhibit 3, pp. 47, 52-59.)
- Records from Bank of America include 2021 tax documents for Strategic Family, Inc. These documents include a “List of Involved Entities and Individuals on Form 8886” that shows 711 Third Avenue, 6th Floor, New York, New York 10017 as the address for some Corporate Defendants, as well as Guidestone Client Services, LLC. (Exhibit 3, pp. 34, 37-46.)

- Records from KeyBank list 711 Third Ave, 6th Floor, New York, New York 10017 as the principal place of business, chief executive office address, principal office, and generally as an address on account statements for some of the Corporate Defendants, including Newport Client Services, LLC. (Exhibit 2, pp. 18-23, 26-27, 29-30, 32, 34, 36, 40, 44, 50.)
 - I reviewed records from the New York Attorney General's Office that included a deposition transcript of Lauren Montanile, a lawyer for SFS. The deposition related to a JAMS arbitration deposition held on January 9, 2020. Montanile testified that her business address is 711 Third Avenue, 6th Floor, New York, New York 10017. (Exhibit 8, p. 170). She further testified that the Client Services Subsidiaries follow the same policies and procedures and are located on the 6th floor. (Exhibit 8, p. 202).
- f. Some of the Corporate Defendants also used the same address in the Buffalo, New York area. For example:
- The UCC Financing Statement shows 115 Lawrence Bell Drive, Amherst, New York 14221 as the mailing address for the following companies: Strategic Financial Solutions, LLC; Strategic FS Buffalo, LLC, and Strategic Consulting, LLC. (Exhibit 7, pp. 2, 3, 6.)
 - KeyBank documents show 115 Lawrence Bell Drive, Amherst, New York 14221 as the principal place of business and chief executive office for Rockwell Client Services, LLC, Stonepoint Client Services, LLC, and Canyon Client Services, LLC. (Exhibit 2, p. 27.)

- g. I reviewed the StratFS, LLC website (stratfs.com) that was captured on December 12, 2023. The website shows that its main office is located at 115 Lawrence Bell Drive, Amherst International Park, Amherst, New York 14221. (Exhibit 11, pp. 1-2.)
- h. I visited the Buffalo News website on November 13, 2023, and December 21, 2023, and found the following articles related to SFS's expansion to the Buffalo area:
- September 17, 2018, titled "Strategic Financial Solutions hiring amid Buffalo's tight labor market," reports that the company decided to expand into the Buffalo area since two of the investors in the company had "Buffalo ties" at that time, and that the company filled 60 percent of the space in the building that they were leasing in Buffalo. (Exhibit 9, pp. 3-4.)
 - January 24, 2020, titled "Strategic Financial makes its mark on Amherst," reports that the company expanded to the Buffalo area from Manhattan and, at least at the time of the article, the company intended to split operations between the Manhattan and Buffalo offices. (Exhibit 9, p. 7.)
 - March 18, 2020, titled "Strapped consumers starting to miss payments," reports that the company had at least 500 employees in the Buffalo office as of 2020. (Exhibit 9, p. 12)

Sasson controls the Corporate Defendants#

12. During the Bureau's investigation, which is outlined in this declaration and its attached exhibits, I learned that bank records show that Sasson owns or operates the SFS entities, either directly or through affiliated and interrelated companies. For example:

- a. I reviewed Bank of America records, including a 2018 tax records for Strategic Family, Inc. that lists Sasson as an officer of the company. (Exhibit 3, p. 6.)
- b. I reviewed records from Valley Bank that include the Amended and Restated Operating Agreement of Encore Capital USA, LLC, which lists Ryan Sasson as one of its "Common Managers." The Operating Agreement lists Twist Financial, LLC (Twist Financial), Duke Enterprises, LLC (Duke Enterprises), and Blaise Investments, LLC (Blaise Investments) as "Common Members." Schedule C of the Operating Agreement lists Sasson as the CEO of Encore. (Exhibit 4, pp. 64, 87-89, 91.)
 - The Valley Bank records also include documents related to the ownership structure of Twist Financial, Duke Enterprises, and Blaise Investments, including: a document titled Limited Liability Company Operating Agreement of Twist Financial, LLC that shows Daniel Blumkin as the sole member of the company (Exhibit 4, pp. 92-95.); a document titled Delaware Limited Liability Company Operating Agreement for Duke Enterprises, LLC that shows Sasson as the sole member of the company

(Exhibit 4, pp. 96-103); and a document titled Delaware Limited Liability Company Operating Agreement for Blaise Investments, LLC that shows Ian Behar as the sole member of that company(Exhibit 4, pp. 104-112).

- c. I reviewed records from Valley Bank concerning BCF Capital, LLC. The records include a document titled Operating Agreement of BCF Capital, LLC (BCF Operating Agreement). The BCF Operating Agreement lists Sasson as one of the “Common Managers” of BCF Capital, LLC. Further, according to Schedule C of the document, its members include Duke Enterprises, LLC, Blaise Investments, LLC, and Twist Financial, LLC. (Exhibit 4, pp. 126, 129, 135, 158-61.) (See also, paragraph 12.b., first sub-bullet above.)
- d. I reviewed records from Valley Bank concerning Strategic Client Support, LLC (f/k/a Pioneer Client Services, LLC). These records show that, as of February 25, 2013, Ryan Sasson is listed as the initial Manager of the company. (Exhibit 4, p. 171.)
 - The Valley Bank records include a document titled Limited Liability Company Operating Agreement of Pioneer Client Services, LLC. This document shows that Encore Capital USA, LLC was the sole member of Pioneer Client Services, LLC. (Exhibit 4, p. 169, 172.) The records include a letter dated April 15, 2015, addressed to the Internal Revenue Service (IRS), and signed by Ryan Sasson, informing the IRS that Pioneer Client

Services, LLC had changed its name to Strategic Client Support, LLC. (Exhibit 4, p. 164.)

- e. I reviewed account opening records from Valley Bank for certain SFS companies. According to these records, Sasson signed many of the account-opening documents for certain SFS companies. For example:
- On or about July 16, 2016, Sasson and Behar signed an account application at Valley Bank for Strategic Financial Solutions, LLC, Strategic CS, LLC, Strategic Consulting, LLC, and Strategic Client Support, LLC. The application shows Sasson and Behar as principals/owners of Strategic Financial Solutions, LLC. (Exhibit 4, pp. 2-7.)
 - On or about July 6, 2016, Sasson signed Bank Leumi Entity Client General Resolution and Relationship Agreements for Strategic Client Support, LLC, BCF Capital, LLC, and Anchor Client Services, LLC, as an individual authorized to “open and close accounts at the Bank, sign check ... give the Bank instructions to withdraw or transfer funds... or otherwise transact on all accounts of the Business,” among other actions, according to the agreement. (Exhibit 4, pp. 39-40, 114-15, 199-200.)
 - The Bank Leumi Entity Client Signature Cards for Strategic Client Support, LLC, BCF Capital, LLC, Anchor Client Services, LLC are signed by Sasson. (Exhibit 4, pp. 48, 116, 123.)
 - I also reviewed Payment Order Requests Agreements, which is an agreement to allow for the signors “to issue payment orders to Bank

Leumi USA to debit...accounts as though a signed original payment order was delivered [to the bank]” for Strategic Client Support, LLC, BCF Capital, LLC, Anchor Client Services, LLC that are signed by Sasson as one of the “Authorized Requestors.” (Exhibit 4, p. 45-47, 120-22, 196-198.)

- On or about January 27, 2017, Sasson signed the Leumi Deposit Capture, Client Application that lists accounts for Strategic Client Support, Strategic Financial Solutions, Pioneer Client Servicing, LLC, Anchor Client Services, LLC, Boulder Client Services, LLC, Harbor Client Services, LLC, among other accounts. The same application shows Sasson as one of the principals/owners of Strategic Financial Solutions, LLC. (Exhibit 4, pp. 32-38.)

13. Bank records from Valley Bank showed that on or about October 18, 2018, the bank received a facsimile from Ryan Sasson, stating “we wish to close the following Bank Leumi accounts” and lists the below entities:

- Anchor Client Services, LLC;
- Atlas Client Services, LLC;
- Atlas Debt Relief, LLC;
- BCF Capital, LLC;
- Bedrock Client Services, LLC;
- Boulder Client Services, LLC;
- Canyon Client Services, LLC;
- Harbor Client Services, LLC;

- Pioneer Client Servicing, LLC;
- Rockwell Client Services, LLC;
- Royal Client Services, LLC;
- Stonepoint Client Services, LLC; and
- Timberline Financial, LLC.

(Exhibit 4, p. 118.)

**Relationships Between Client Services Subsidiaries and
Corresponding Façade Firms**

14. During the Bureau’s investigation, which is outlined in this declaration and its attached exhibits, I learned that each of the Client Services Subsidiaries appears to correspond to a third-party law firm (“Façade Firm”) that may carry a similar name. Below is a representation of the Client Services Subsidiaries and corresponding Façade Firms.

Client Services Subsidiary	Corresponding Façade Firm
Anchor Client Services, LLC, now known as CS 1 PAAS Services, LLC	Anchor Law Firm, PLLC
Bedrock Client Services, LLC	A. Florio & Associates, PLLC d/b/a Bedrock Legal Group f/k/a Raggio & Associates, PLLC
Boulder Client Services, LLC	Boulder Legal Group, LLC
Canyon Client Services, LLC	JMS Industries, LLC d/b/a Canyon Legal Group, LLC

Client Services Subsidiary	Corresponding Façade Firm
Carolina Client Services, LLC	Daniel Rufty Legal, PLLC d/b/a Carolina Legal Services
Great Lakes Client Services, LLC	Great Lakes Law Firm, LLC
Guidestone Client Services, LLC	The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group
Harbor Client Services, LLC	Harbor Legal Group, LLC, f/k/a Atlas Law Group, LLC (organized in Colorado); Harbor Legal Group, LLC (organized in Illinois)
Heartland Client Services, LLC	Henry Legal Group, PLLC d/b/a Heartland Legal Group
Monarch Client Services, LLC, now known as CS 2 PAAS Services, LLC	Burnette Legal Group, LLC d/b/a Monarch Legal Group
Newport Client Services, LLC	Greene Legal Group LLC d/b/a Newport Legal Group
Northstar Client Services, LLC	Northstar Legal Group LLC
Option 1 Client Services, LLC	Gardner Legal LLC d/b/a Option 1 Legal
Pioneer Client Servicing, LLC	Pioneer Law Firm, P.C. f/k/a John B Dougherty P.C.
Rockwell Client Services, LLC	Hodyno & Associates, PLLC d/b/a Rockwell Legal Group

Client Services Subsidiary	Corresponding Façade Firm
Royal Client Services, LLC	Royal Legal Group, LLC
Stonepoint Client Services, LLC	Donald Norris Associates, PLLC d/b/a Stonepoint Legal Group, LLC
Summit Client Services, LLC, now known as CS 3 PAAS Services, LLC	WyoLaw, LLC d/b/a Summit Law Firm
Whitestone Client Services, LLC	The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Legal Group

15. KeyBank records also show a connection between certain Client Services Subsidiaries and certain Façade Firms. These records include a list of Law Firm Service Agreements between certain Façade Firms and the corresponding Client Services Subsidiaries. (Exhibit 2, p. 24.)

Façade Firms

16. Exhibit 12 consists of true and correct copies of the Façade Firms' company records, including charter documents, which I obtained and reviewed. I downloaded many of them from secretary of state websites. My search and the company records provide the following information:

- a. On November 17, 2023, I requested a copy of the charter records for Anchor Law Firm, PLLC (Anchor Law Firm) from the Arkansas Secretary of State. These documents provide that Anchor Law Firm is an Arkansas Professional Limited Liability Company organized in Arkansas on

December 3, 2015. As of December 15, 2023, the Arkansas Secretary of State website noted that Anchor Law Firm was in “Good Standing” (Exhibit 12, pp. 1, 2);

- b. On December 16, 2023, I downloaded documents about Anchor Law Firm, PLLC from the New Hampshire Department of State website. According to this website, Anchor Law Firm is a Foreign Professional Limited Liability Company in New Hampshire. The entry shows the principal as Thomas Rogus, with a business address of 211 W. Wacker, 9th Floor, Chicago, IL 60661. The entry also shows a business email address of tburnettelaw@gmail.com. Timothy Burnette is listed as an authorized representative of the company in the Application for Registration as a Foreign Professional Limited Liability Company and as an authorized signor for the company’s Annual Reports for 2021 through 2023 (Exhibit 12, pp. 3-10);
- c. On November 17, 2023, I downloaded documents about A. Florio & Associates, PLLC (A. Florio & Associates) from the Texas Secretary of State website. The documents show that A. Florio & Associates is a Texas Professional Limited Liability Company organized in Texas on October 31, 2016, as Raggio & Associates, PLLC. On or about January 3, 2017, the company filed an Assumed Name Certificate adopting Bedrock Legal Group as its assumed name. On or about August 1, 2017, the company filed a Certificate of Amendment to amend its name to A. Florio & Associates, PLLC. James Agosto is listed as an officer. The company’s filed 2017, 2018, 2019, 2020, 2021, 2022 Texas Franchise Tax Public Information Reports

(PIR) show James Agosto signed the reports as a member. Agosto is listed as a member on the 2018 through 2022 PIR reports. On December 15, 2023, I searched the Texas Comptroller of Public Accounts, which provides information related to the status of Texas taxable entities. As of that date, this website listed A. Florio & Associates as “Active” in Texas (Exhibit 12, pp. 11-26);

- d. On December 6, 2023, I downloaded documents about Boulder Legal Group, LLC (Boulder Legal Group) from the Missouri Secretary of State website. The company records provide that Boulder Legal Group, LLC is a Missouri limited liability company organized on September 13, 2015. As of December 15, 2023, Boulder Legal Group is listed on this site as “Active” in Missouri (Exhibit 12, pp. 27-31);
- e. On December 6, 2023, I downloaded documents about JMS Industries, LLC (JMS Industries) from the Indiana Secretary of State website. The company records provide that JMS Industries is an Indiana limited liability company organized on April 3, 2017. The company records further provide that on or about December 19, 2017, the company added Richard Kerr Gustafson II as a Manager at the Company. On or about January 12, 2018, the company filed a Certificate of Assumed Business Name for Canyon Legal Group, LLC. Further, the records show that the company’s 2021 and 2022 Business Reports were signed by Timothy F. Burnette as an Authorized Agent. As of December 15, 2023, JMS Industries, LLC is listed on the site as “Active” in Indiana (Exhibit 12, pp. 32-49);

- f. On December 6, 2023, I downloaded documents about Daniel Rufty Legal, PLLC (Daniel Rufty Legal) from the North Carolina Secretary of State website. The company records provide that Daniel Rufty Legal is a North Carolina professional limited liability company organized on or about February 22, 2018, as Meg Sohmer Wood, PLLC. Further, the records provide that on or about May 3, 2019, the company filed an Amendment of Articles of Organization to change the name of the company to Daniel Rufty Legal, PLLC. On or about June 12, 2019, the company filed an Assumed Business Name Certificate listing the assumed name as Carolina Legal Services. As of December 15, 2023, Daniel Rufty Legal is listed on the site as “Active” in North Carolina (Exhibit 12, pp. 50-56);
- g. On November 17, 2023, I asked the Wisconsin Department of Financial Institutions to provide all charter documents filed for Great Lakes Law Firm, LLC. According to these records, Great Lakes Law Firm, LLC is a Wisconsin limited liability company organized on February 26, 2018 (Exhibit 12, pp. 57-60);
- h. On December 4, 2023, I downloaded documents about The Brian A. Moore Law Firm, LLC (The Brian A. Moore Law Firm) from the Georgia Secretary of State website. According to the corporate documents, The Brian A. Moore Law Firm is a Georgia limited liability company organized on March 13, 2018. Brian Moore, listed as the organizer and registered agent on the company’s Articles of Organization, signed the Annual Registration reports for 2019 and 2020 reporting periods. On July 19, 2021, the company received a Notice of Intent to Administratively Dissolve

and was later reinstated as of December 15, 2021. On or about March 7, 2022, the company filed an Annual Registration, and Timothy Burnette signed the document as an authorized person. Timothy Burnette also signed the company's Annual Registration and Amended Registration on January 28, 2023 (Exhibit 12, pp. 61-73);

- On November 3, 2023, I requested for a certified copy of the trade name records for The Brian A. Moore Law Firm. Accordingly, on or about September 28, 2020, the company filed an Application to Register a Business to be Conducted Under a Trade Name with the State of Georgia, Fulton County, listing the trade name as Guidestone Law Group; (Exhibit 12, pp. 74.)
- i. On December 14, 2023 and December 29, 2023, I downloaded documents about Harbor Legal Group, LLC (Harbor Legal Group) from the Colorado Secretary of State website. According to the company records, Harbor Legal Group is a Colorado limited liability company organized under the name G. Anthony Yuthas, LLC on or about December 12, 2013. The name of the registered agent on the Articles of Organization was George Anthony Yuthas. On or about May 22, 2014, the company filed an Articles of Amendment to change the company's name to The Atlas Law Group, LLC, and on or about October 1, 2014, the company filed another Articles of Amendment to change the company's name to Harbor Legal Group, LLC. (Exhibit 12, pp. 75-82.)

- On or about February 24, 2015, Kevin Narko at 211 W. Wacker, Suite 250, Chicago, IL 60606 filed a periodic report on behalf of the company. In December 2016, the company's registered agent used the following address: 355 S. Teller Street, Suite 200, Lakewood, CO 80226. On or about November 27, 2017, Timothy Burnette filed a periodic report on behalf of the company. And in November 2023, the company reported the following principal office address: 200 Union Blvd, Suite 200, Lakewood, CO 80228. According to the Certificate of Fact of Good Standing dated December 16, 2023, which I downloaded from the Colorado, Secretary of State, Business Database Search site, the company is in good standing (Exhibit 12, pp. 83-90);
- j. On December 6, 2023, I downloaded documents about Harbor Legal Group, LLC (Harbor Legal Group) from the Illinois Secretary of State website. According to the company records filed with Illinois, Harbor Legal Group is an Illinois limited liability company organized on May 10, 2021. The company's organizer and registered agent is Timothy Burnette, and the manager and member is George Anthony Yuthas at 355 S. Teller Street, Suite 200, Lakewood, CO 80226. On or about April 26, 2023, the company filed a report listing its principal place of business as 200 Union Blvd, Suite 200, Lakewood, CO 80228. As of December 16, 2023, Harbor Legal Group is listed on the Illinois Secretary of State website as "Active." (Exhibit 12, pp. 91-95);

- k. On December 4, 2023, I downloaded documents about Henry Legal Group, PLLC (Henry Legal Group) from the Michigan Secretary of State website. According to the company records filed with Michigan, Henry Legal Group is a Michigan professional limited liability company organized on March 3, 2018. The company's Articles of Organization lists Sequara Henry as the company's organizer and resident agent. On or about June 12, 2018, the company filed a Certificate of Assumed Name adopting the name Heartland Legal Group. The Certificate of Assumed Name was signed by Timothy F. Burnette, Esq., as an authorized agent. The company's 2019, 2020, 2021, and 2022 Annual Report and Annual Statements were all signed by Timothy F. Burnette as an Authorized Agent (Exhibit 12, pp. 96-111);
- l. On December 4, 2023, I downloaded documents about Burnette Legal Group, LLC (Burnette Legal Group) from the Illinois Secretary of State website. According to the company records from Illinois, Burnette Legal Group is an Illinois limited liability company organized on November 29, 2018. The manager and registered agent for the company is Timothy Burnette, 211 W Wacker Drive, Suite 300, Chicago, IL 60606-1390. On or about December 20, 2018, the company filed an Application to Adopt an Assumed Name with the Department of Business Services, Limited Liability Division of Illinois, adopting the assumed name of Monarch Legal Group. On or about October 22, 2020, the company renewed its use of this assumed name. As of January 6, 2024, the company is listed as "Active," on the Illinois Secretary of State website. (Exhibit 12, pp. 112-20);

m. On December 4, 2023, I downloaded documents about Greene Legal Group LLC (Greene Legal Group) from the Secretary of the Commonwealth of Massachusetts website. According to the company records from Massachusetts, Greene Legal Group is a professional limited liability company organized on October 9, 2019. Taylor Greene is listed as the registered agent and is the only manager listed for the company, according to the Massachusetts website. Timothy Burnette signed the Annual Reports in 2020, 2021, and 2022. I contacted Massachusetts on December 15, 2023, to find out the status of the company. According to the representative who I talked to, the company is administratively not in good standing, as it did not file an annual report for 2023. (Exhibit 12, pp. 121-35).

- On or about October 18, 2023, I reached out to the Concord, Massachusetts, Town's Clerk to inquire about Greene Legal Group doing business as Newport Legal Group. The office representative told me that Greene Legal Group did not file a document requesting to use the business name Newport Legal Group. However, the Newport Legal Group websites shows the name Greene Legal Group (Exhibit 19, pp. 198, 201, 218, 220-23), and Newport Legal Group's Better Business Bureau profile includes an alternative name of Greene Legal Group LLC, under the company profile section of the site. (Exhibit 27, pp. 3, 4.)

- n. On December 6, 2023, I downloaded documents about Northstar Legal Group LLC (Northstar Legal Group) from the Minnesota Secretary of State website. According to the company records filed with Minnesota, Northstar Legal Group is a Minnesota limited liability company organized on January 28, 2019. On or about March 30, 2023, the company filed an Amendment to the Articles of Organization to change the business mailing address, and Timothy Burnette is listed on that document as the contact person for the company (Exhibit 12, pp. 136-43);
- o. On December 6, 2023, I downloaded documents about Gardner Legal, LLC (Gardner Legal) from the State of Maryland website. According to the company records filed with Maryland, Gardner Legal is a Maryland limited liability company organized on March 22, 2018. Phiona Gardner is listed as the authorized person on the company's Articles of Organization. On or about November 28, 2018, the company completed a Trade Name Application for use of the trade name Option 1 Legal. On December 29, 2023, I searched the State of Maryland website for the status of Option 1 Legal, as of December 18, 2023 the trade name status is "Forfeited," due to a "lapse in term." As of December 16, 2023, Gardner Legal is listed as "Active" in Maryland (Exhibit 12, pp. 144-52);
- p. On December 14, 2023, I downloaded documents about Pioneer Law Firm, P.C. (Pioneer Law Firm) from the Colorado Secretary of State website. According to the company records filed with Colorado, Pioneer Law Firm is a Colorado professional corporation incorporated on April 29, 2008, as

John B Dougherty P.C. On or about February 26, 2013, the company filed an Articles of Amendment to change its name to Pioneer Law Firm, P.C. Timothy Burnette, 211 W. Wacker Drive, Chicago, IL 60606, filed the company's periodic reports for 2017, 2018, 2019, 2020, 2021, and 2022. According to the Certificate of Fact of Good Standing dated December 22, 2023, which I downloaded from the Colorado, Secretary of State, Business Database Search site, the company is in good standing (Exhibit 12, pp. 153-83);

q. On December 6, 2023, I downloaded documents about Hodyno & Associates, PLLC (Hodyno & Associates) from the Arizona Corporations Commission website. According to the company records filed with Arizona, Hodyno & Associates is an Arizona professional limited liability company organized on April 3, 2017. Brant Hodyno signed the company's Articles of Organization. Hodyno was listed as the only member of the company until May 24, 2021, when Desarae Tucker became the only member of the company, according to records from the Arizona Secretary of State website. On or about May 24, 2021, the company filed an Articles of Amendment, and Timothy Burnette signed the document as an Authorized Representative. As of December 16, 2023, the company is listed as "Active" in Arizona (Exhibit 12, pp. 184-96;

- On or about December 6, 2023, I searched for information about Rockwell Legal Group on the Minnesota Secretary of State website. According to the site, Hoydno & Associates uses the assumed name

of Rockwell Legal Group. As of December 6, 2023, the assumed name is listed as “Active” in Minnesota (Exhibit 12, p. 197);

- On December 17, 2023, I downloaded documents about Hodyno & Associates from the Ohio Secretary of State website. According to the company records filed with Ohio, Hodyno & Associates is an active foreign limited liability company. The company filed its Registration of a Foreign Limited Liability Company on or about April 10, 2018, and Timothy Burnette signed the document as an authorized representative (Exhibit 12, pp. 198-201);
- r. On December 6, 2023, I downloaded documents about Royal Legal Group, LLC (Royal Legal Group) from the Kansas Secretary of State website. According to company records that I reviewed, Royal Legal Group is a Kansas limited liability company organized on November 7, 2016. The company’s 2017 Limited Liability Company Annual Report shows Timothy Burnette as a member and Donald Norris as a member who owns 5% or more of capital of the company. Timothy F. Burnette signed the company’s 2019 annual report as an authorized person. Richard Gustafson signed the company’s 2022 Limited Liability Company Annual Report on May 31, 2023. As of December 16, 2023, the company is “Active and in Good Standing” in Kansas (Exhibit 12, pp. 202-11);
- s. On December 16, 2023, I searched for and printed copies of information about Donald Norris Associates, PLLC (Donald Norris Associates) from Nevada’s Business Portal. According to the Nevada Business Portal, Donald Norris Associates is a Nevada professional limited liability

company organized on November 30, 2016. Nevada's Business Portal shows that Donald P. Norris was a managing member from September 4, 2018 until September 20, 2022, when Richard Gustafson and Whitney Wilcher became managing members of the company. According to the records on Nevada's Business Portal, Whitney Wilcher's address is listed as 410 South Rampart, Suite 390, Las Vegas, Nevada 89145. Further, according to the Nevada Business Portal, the company is "Active" as of December 16, 2023 (Exhibit 12, pp. 212-18)

- On December 21, 2023, I downloaded a certified copy of the Registration of an Assumed Business Name for Stonepoint Legal Group, LLC from the Montana Secretary of State website.

According to the company records that I reviewed, Stonepoint Legal Group, LLC was registered as an assumed name for Donald Norris Associates, PLLC on or about April 30, 2018, and Timothy Burnette signed the document as "Attorney in Fact." The assumed name, Stonepoint Legal Group, LLC, expired on April 30, 2023, and is currently inactive (Exhibit 12, pp. 219-21);

- t. On December 6, 2023, I downloaded documents about WyoLaw, LLC (WyoLaw) from the Wyoming Secretary of State website. According to company records filed with Wyoming, WyoLaw is a Wyoming limited liability company organized on October 31, 2017. Tracy Mears is listed as the organizer and registered agent on the company's Limited Liability Company, Articles of Organization filed with Wyoming, Secretary of State. According to company records filed with Wyoming, Timothy Burnette

signed the company's 2018, 2019, 2020, 2021, 2022, and 2023 Limited Liability Company Annual Reports. Burnette signed the company's Change of an Entity's Registered Agent and Office form, filed on or about November 21, 2018, as an Agent (Exhibit 12, pp. 222-40);

- On December 6, 2023, I searched the Pennsylvania, Department of State website for the name Summit Law Firm. According to Pennsylvania records, on or about May 21, 2018, WyoLaw filed a fictitious name filing with the Pennsylvania Department of State for the name Summit Law Firm (Exhibit 12, p. 241;
 - On December 17, 2023, I downloaded documents about WyoLaw from the Florida Department of State, Division of Corporations website. According to Florida records, WyoLaw is a Foreign Limited Liability Company in Florida, with an original filing date of October 9, 2019. The Florida records show that Timothy Burnette is listed as the contact person for the company (Exhibit 12, pp. 242-51); and
- u. On December 6, 2023, I downloaded documents about The Sands Law Group, A Professional Law Corporation (Sands Law Group) from the California Secretary of State website. According to records filed with California, Sands Law Group is a California professional law corporation organized on February 1, 2019, by Thomas D. Sands, who is also the Chief Executive Officer, Secretary, and Chief Financial Officer of the company. (Exhibit 12, pp. 252-56)

- On December 6, 2023, I searched the Pennsylvania Department of State website for the name Whitestone Legal Group. According to Pennsylvania records, on or about January 24, 2019, and November 5, 2020, the company filed fictitious name documents with the Pennsylvania Department of State for the name Whitestone Legal Group. (Exhibit 12, p. 257)

17. During the Bureau's investigation, which is outlined in this declaration and its attached exhibits, I learned that the Façade Firms appear to be connected to one another as follows:

- a. As provided in paragraph 16 above, subparts a. through u., I requested, reviewed, and collected records from state secretary of state offices concerning the Façade Firms, and I found that some of the same individuals appear in multiple Façade Firms' filings with different states. (See also, [Table 2.](#))
- b. For example, Timothy Burnette appears as a registered agent, agent, authorized representative/person, contact person, attorney, and/or manager in some of the company filings for the following Façade Firms:
 - Anchor Law Firm, LLC;
 - JMS Industries, LLC d/b/a Canyon Legal Group, LLC;
 - The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group;
 - Harbor Legal Group, LLC (Colorado);
 - Harbor Legal Group, LLC (Illinois);
 - Henry Legal Group, PLLC d/b/a Heartland Legal Group;

- Burnette Legal Group, LLC d/b/a Monarch Legal Group;
- Greene Legal Group LLC d/b/a Newport Legal Group;
- Northstar Legal Group LLC;
- Pioneer Law Firm, P.C.;
- Hodyno & Associates, PLLC d/b/a Rockwell Legal Group; and
- Donald Norris Associates, PLLC d/b/a Stonepoint Legal Group;
- WyoLaw, LLC. d/b/a Summit Law Firm

Also, as listed in company records provided on secretary of state websites, Richard Gustafson appears as a manager, managing member, or a signer for JMS Industries, LLC, Donald Norris Associates, PLLC, and Royal Legal Group, LLC (See Table 2);

- c. I reviewed records received from the State of Wyoming, Office of the Attorney General. The records included court filings with the State of Wyoming, Fifth Judicial District, *Carmon v. Strategic Financial Solutions, LLC*, Civ. Action No. 29806 (Wy. Dist. Ct. 2020). According to the court records, on or about July 30, 2020, Timothy Burnette signed an Affidavit indicating that he “act[ed] as outside counsel, for Anchor Law Firm...” (Exhibit 13, p. 102);
- d. The Façade Firms used the same, or similar, mailing addresses. Records show that many of the façade firms used mailing addresses at 211 W Wacker Drive, Chicago, Illinois 60606. For example:

- In documents that I reviewed from the Illinois Secretary of State, I saw that **Burnette Legal Group, LLC d/b/a Monarch Legal Group** used this address at Suite 900B as a principal office address (Exhibit 12, pp. 112-13, 117-18);
- In documents that I reviewed from the Ohio Secretary of State, **Hodyno & Associates, PLLC d/b/a Rockwell Legal Group** used this address at Suite 300, as the address to request for copies of company records, and Timothy Burnette as listed as the contact at that location. (Exhibit 12, p. 198); and
- In documents that I downloaded from the Colorado Secretary of State, I saw that **Harbor Legal Group, LLC** used this address at Suite 900B as its principal mailing address (Exhibit 12, p. 90).
- In Associated Bank records that I reviewed,
 - **Burnette Legal Group, LLC d/b/a Monarch Legal Group** used this address at Suites 321. (Exhibit 14, p. 23);
 - **Pioneer Law Firm, P.C.** used this address at Suite 200 (Exhibit 14, p. 35); and
 - **WyoLaw LLC** used this address at Floor 3 (Exhibit 14, p. 26).
- In Bank of America records that I reviewed,
 - **Anchor Law Firm, PLLC** used this address at Suite 300 on some of the company's checks from accounts held at U.S. Bank National Association and JPMorgan Chase (Exhibit 3, p. 8);
 - **Raggio & Associates PLLC (now known as A. Florio & Associates, PLLC) d/b/a Bedrock Legal Group** used this

address at Suite 300 on some of the company's checks from accounts held at JPMorgan Chase (Exhibit 3, p. 14);

- **Boulder Legal Group, LLC** used this address at Suite 300 on at least one of the company's checks from an account held at JPMorgan Chase (Exhibit 3, p. 10);
- **JMS Industries, LLC d/b/a Canyon Legal Group, LLC** used this address at Suite 300 on some of the company's checks from accounts held at JPMorgan Chase (Exhibit 3, p. 15);
- **Harbor Legal Group, LLC** used this address at Suite 300 on some checks from an account held at Silicon Valley Bank (Exhibit 3, p.18);
- **Henry Legal Group, LLP d/b/a Heartland Legal Group** used this address at Suite 300 at least one check from an account held at JPMorgan Chase (Exhibit 3, p. 20);
- **Burnette Legal Group, LLC d/b/a Monarch Legal Group** used this address at Suite 900 on its account statements (Exhibit 3, p. 9);
- **Greene Legal Group, LLC d/a/a Newport Legal Group** used this address at Suite 300 on some checks from an account held at JPMorgan Chase (Exhibit 3, p. 16);
- **Northstar Legal Group, LLC** used this address at Suite 300 on at least one check from an account held at JPMorgan Chase (Exhibit 3, p. 21);

- **Pioneer Law Firm, P.C.** used this address at Suites 200 and 300 on checks from accounts held at Associated Bank and Silicon Valley Bank. (Exhibit 3, p. 12);
 - **Hodyno and Associates, PLLC d/b/a Rockwell Legal Group** used this address at Suite 300 on checks from an account held at Silicon Valley Bank (Exhibit 3, p. 13); and
 - **The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Law Group** used this address at Suite 300 on checks from an account held at JPMorgan Chase (Exhibit 3, p. 17.)
- e. Many of the Façade Firms had the same individuals appear as signatories, appointed power of attorney, or otherwise appear as members and/or beneficial owners in bank records. For example:
- I reviewed Associated Bank records that showed Timothy Burnette was the managing member of Burnette Legal Group, LLC d/b/a Monarch Legal Group, Gardner Legal LLC d/b/a Option 1 Legal, and Henry Legal Group, LLP d/b/a Heartland Legal Group. (Exhibit 14, p. 23-25.)
 - I reviewed Associated Bank records that showed Javier Avila named as the authorized signer for bank accounts held by many of the Façade Firms, including the following:
 - Burnette Legal Group, LLC d/b/a Monarch Legal Group;
 - Gardner Legal LLC d/b/a Option 1 Legal;
 - Great Lakes Law Firm, LLC;

- Greene Legal Group, LLC d/b/a Newport Legal Group;
- Harbor Legal Group, LLC;
- Henry Legal Group, LLP d/b/a Heartland Legal Group;
- Pioneer Law Firm, P.C.;
- Northstar Legal Group LLC; and
- WyoLaw, LLC, d/b/a Summit Law Firm.

(Exhibit 14, pp. 2-5, 8-12, 14.)

- I reviewed Bank of America records that showed that in or about May and September 2020, the following firms appointed attorney Andrew Carroll as their Power of Attorney for their accounts at Bank of America:

- Anchor Law Firm, PLLC;
- Gardner Legal LLC d/b/a Option 1 Legal;
- Greene Legal Group, LLC d/b/a Newport Legal Group;
- Henry Legal Group, PLLC d/b/a Heartland Legal Group;
- JMS Industries, LLC d/b/a Canyon Legal Group;
- The Sands Law Group, LLP d/b/a Whitestone Legal Group; and
- WyoLaw, LLC d/b/a Summit Law Firm.

(Exhibit 3, pp. 27-33.)

- I reviewed Associated Bank records that show attorney Guillermo Geisse as the sole owner and Managing Member of Great Lakes Law

Firm and a Managing Member of WyoLaw, LLC. (Exhibit 14, pp. 26, 30.)

f. In some cases, the Façade Firm's public records filed with the respective secretary of state office provides information about listed members, owners, organizers, or otherwise shows an apparent affiliation between the organizer, or registered agents, and the company; however, certain bank records show a different beneficial owner, controlling owner, or otherwise managing member for the Façade Firm. For example:

- Georgia's Secretary of State documents show that Brian Moore is listed as the organizer and registered agent for The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group. I reviewed records from Associated Bank that shows Michelle Gallagher as the only controlling owner identified for the accounts in the firm's name at Associated Bank. (Exhibit 12, pp. 61, 64-66, 70-74; Exhibit 14, p. 29.)

The State of Maryland documents show that for Gardner Legal LLC d/b/a Option 1 Legal, Phiona Gardner is listed as the authorized person on the company's Articles of Organization filed with the State of Maryland. The Associated Bank records that I reviewed show Timothy Burnette, Managing Member, as the only controlling owner listed. (Exhibit 12, p. 147; Exhibit 14, p. 25.)

- Michigan Secretary of State records show Sequara Henry listed as the organizer and resident agent for Henry Legal Group, LLP d/b/a Heartland Legal Group. The Associated Bank records that I reviewed show Timothy Burnette as the only controlling owner. (Exhibit 12, pp. 96-98, 100, 102-109; Exhibit 14, p. 24.)
- g. Some of the Façade Firms had the same individuals signing contracts, communicating with service providers, and otherwise acting on behalf of the Façade Firm. For example, I reviewed documents from the Minnesota Attorney General's Office about Sunshine Signing Connection, Inc. (Sunshine) that showed certain individuals signing contracts between multiple Façade Firms and Sunshine:
- Guillermo Geisse signed contracts on behalf of WyoLaw, LLC and Great Lakes Law Firm, LLC (Exhibit 17, pp. 13, 39);
 - Thomas Burnette signed contracts on behalf of Henry Legal Group LLP d/b/a Heartland Legal Group and Gardner Legal LLC d/b/a Option 1 Legal (Exhibit 17, pp. 19, 31); and
 - James Agosto signed contracts on behalf of Northstar Legal Group LLC and The Sands Law Group, LLP d/b/a Whitestone Legal Group. (Exhibit 17, pp. 25, 37.)
- h. I reviewed documents about Northstar Legal Group from the Minnesota Attorney General's Office. These documents included email communication between the Better Business Bureau in Minnesota and

North Dakota, on one hand, and Timothy Burnette and James Agosto, on the other hand. An email dated November 17, 2020, with subject, “Northstar Legal Group BBB Accreditation” between the Better Business Bureau in Minnesota and North Dakota and Timothy Burnette, indicates that Agosto is a principal in Bedrock Legal and Northstar. (Exhibit 17, pp. 40, 47-48)

18. Through the course of the investigation, which is outlined in this declaration and its attachments, I learned that SFS directed some of the activity of the Façade Firms. For example:

- a. Sasson maintained, and/or otherwise paid for, the domain registrations for all of the Façade Firms, at least once from January 1, 2016, to December 1, 2022. I reviewed records from GoDaddy.com, the registrar for the Façade Firms’ domains. According to the GoDaddy.com records, Sasson bought or originally registered, and/or paid some of the annual fees to GoDaddy.com for the Façade Firm domains registrations.

Additionally:

- According to the GoDaddy.com records, for each of the Façade Firm’s domain, the GoDaddy.com records list a “Shopper ID” that is identified as belonging to Ryan Sasson, at 711 3rd Avenue, 6th Floor, New York, New York 10017. (Exhibit 18, see, 1-4.)
- The GoDaddy.com records further show that SFS pays the annual domain fees for many of the Façade Firm websites and Sasson’s email address is associated with some of the Façade Firm domains. (Exhibit 18, e.g., pp. 5, 6, 8, 22.)

- Table 3 provides a representation of Sasson’s registration and payment history of the Façade Firm domain names, based on the GoDaddy.com production. Excerpts of some of these records are provided in Exhibit 18.
- b. I accessed the Façade Firms’ websites and printed pages from those websites. Table 4 attached hereto is a summary of the websites that I identified.
- Many of the Façade Firms’ websites provided a login link to a consumer’s account, which leads to a login site for SETL. (Exhibit 19, pp. 225, 294, 335, 372, 401, 402, 466.) Further, I reviewed email correspondence from CS@email.carolinalegalservices.com to a consumer. At the bottom of the email, there is a reference to “Download our app, powered by SETL Solutions” (Exhibit 5, p. 69).
 - On December 25, 2023, I printed a copy of the SETL Solutions Google Play review site, which shows that SETL Solutions is an application that consumers can use to monitor their account for debt-management services. Further, the description provided indicates to access an account at the SETL App “you must be a client with one of our Legal and Financial partners.” (Exhibit 20.)

- Bank of America records related to a 2021 Strategic Family, Inc. tax document Form 8886, included a document titled “List of Involved Entities and Individuals on Form 8886” which listed many of the Corporate Defendants, among other entities to include SETL, and showed that SETL, LLC uses the same address: 711 Third Ave, Floor 6, New York, New York 10017. (Exhibit 3, p. 43.)
 - KeyBank records show that Sasson requested to close a bank account for SETL, LLC when Sasson closed all of the SFS KeyBank accounts. (Exhibit 2, pp. 48-49).
 - Further, many of the Façade Firm websites reference Andrew Carroll, Esq. as “an attorney admitted to practice law in New Jersey,” and provide that he “is the supervising lawyer in charge of all New Jersey matters,” and provide the same phone number (609-400-1302) for him. (Exhibit 19, pp. 104, 198, 296, 338, 531, for some examples of those websites).
- c. I reviewed documents that reflected Corporate Defendants paying for certain administrative fees for the Façade Firms. For example, according to records from the New York Attorney General’s Office, Strategic CS, LLC received invoices from ADP, Inc., its payroll provider, not only for multiple Corporate Defendants’ payroll processing charges, but for multiple Façade Firms’ payroll processing charges as well, including Hodyno & Associates PLLC a/k/a Rockwell Legal, Donald Norris Associates, PLLC d/b/a

Stonepoint Legal Group, LLC, Greene Legal Group LLC d/b/a Newport Legal Group, and Northstar Legal Group LLC . (Exhibit 8, p. 261.)

**Blust controls and is heavily involved with
companies that are part of the scheme**

19. Better Business Bureau records show that Blust was a member of Boulder Legal Group, LLC. (Exhibit 8, p. 16). Associated Bank records list Blust as a Vice President of Pioneer Law Firm, P.C. on an opening account form and as a controlling owner of the company. (Exhibit 14, p. 11) Also, he was involved in handling various filing expenses and other operational work for WyoLaw, LLC. (Exhibit 13, pp. 45-101.)

20. Blust was involved in the handling of consumer complaints concerning at least one of the Façade Firms. I reviewed RAM records, which include email communication between RAM staff members and Strategic Financial Solutions, LLC. In an email exchange the Chief Operating Officer of RAM forwarded an email that RAM staff sent to cs@rockwelllegalgroup.com concerning a client who called and said “he has been contacted by the FTC regarding his charged off debt that he had originally enrolled in the program to pay off...” Sasson responded to the email from the Chief Operating Officer that he “forwarded [the client email] to Jason Blust and he is going to reach out.” (Exhibit 16, pp. 13-14.)

21. Documents provided by Associated Bank show that Jason Blust is the only controlling owner of accounts for Lit Def Strategies, LLC and Relialit, LLC. (Exhibit 14, pp. 27, 31.)

22. Exhibit 21 is true and correct copies of the company records of three companies operated by Blust, including charter documents. I downloaded these documents from the Illinois Secretary of State website. My search and the company records provide the following information:

- a. On December 17, 2023, I downloaded documents about Lit Def Strategies, LLC, an Illinois limited liability company organized on December 20, 2019. The principal address for the company is 211 W. Wacker Drive, Suite 900B, Chicago, Illinois 60606. The records show Timothy Burnette as the Registered Agent for the company and Jason Blust as the only manager of the Company. On or about September 15, 2023, the company filed a Notice of Dissolution, with a dissolution date of June 9, 2023. The company is listed as Active, as of January 6, 2024. (Exhibit 21, pp. 1-5.)
- b. On December 24, 2023, I downloaded documents about Relialit, LLC, an Illinois limited liability company organized on February 19, 2019. Jason Blust is listed as the registered agent for Relialit and the sole manager of the company. On August 13, 2021, the company administratively dissolved and is no longer active. (Exhibit 21, pp. 6-8.)
- c. On December 24, 2023, I downloaded documents about The Law Office of Jason Blust, LLC, organized in Illinois on December 4, 2013. Jason Blust is the registered agent and sole manager of the company. The principal address for the company is 211 W. Wacker Drive, Suite 900B, Chicago, Illinois 60606. The company is listed as Active, as of January 6, 2024. (Exhibit 21, pp. 9-15.)

23. Lit Def Strategies and Relialit were responsible for providing administrative support for lawsuits filed against SFS consumers. According to deposition testimony by Daniel Rufty, when a SFS consumer receives a summons concerning a lawsuit from a creditor, the consumer sends the lawsuit documents to Carolina Client Services, LLC. Carolina Client Services then sends the lawsuit documents to Lit Def Strategies. (Exhibit 5, pp. 8-9). Documents provided by the North Carolina State Bar concerning a disciplinary proceeding against Daniel Rufty stated that Lit Def Strategies “provides administrative support for litigated matters on behalf of [Carolina Client Services] clients.” (Exhibit 5, p. 64).

24. In his deposition testimony, Rufty further explained that Relialit may have existed before Lit Def Strategies and likely had a similar function. (Exhibit 5, p. 22.)

25. Blust also appeared to have control over, or otherwise manage, SFS staff in the Buffalo office. I reviewed phone calls from New York Attorney General’s Office production from Deepgram. (Callahan Declaration, 19). According to calls that I reviewed, Blust appears to be directing some of the supervisory activity related to SFS’s negotiations, client support, and compliance staff. In one call Blust indicates that “we don’t have anybody on site [concerning compliance] there yet...but the plan is that you are going to?” when referencing staffing decisions related to the SFS Buffalo location. In this call he mentions talking with Ryan. (Callahan Declaration, Callahan Table 1.)

26. Like the Façade Firms, companies where Blust is listed as the registered agent, member, manager, or owner on secretary of state records, or bank records, used the address at 211 W Wacker Drive, Chicago, Illinois 60606, including the following:

- Lit Def Strategies, LLC used this address at Suites 311 for its accounts at Associated Bank and used this address at Suite 900B for filings with the Illinois Secretary of State. (Exhibit 21, p. 2-5); and
- The Blust Family Irrevocable Trust used this address at Suite 311. (Exhibit 14, p. 32.)

27. Jason Blust and Burnette also used this address for other businesses:

- The Law Office of Jason Blust, LLC used this address at Suite 200 (Exhibit 15, p. 27) and Jason Blust has this as an address affiliated with his name at Suite 300 (Exhibit 15, p.30), according to the JPMorgan Chase records that I reviewed;
- Blust is listed as the controlling owner and managing member of Credit Advocates Law Firm, LLC, according to records from Associated Bank, the company used this address at Suite 200. (Exhibit 14, p.1) Also, according to the company filings with the Illinois Secretary of State, the company used this address at Suite 900B. (Exhibit 21, p. 16); and
- Blust is listed as the President of Lighthouse Tax and Financial LLP, according to records from Associated Bank, which used this address at Suite 200. (Exhibit 14, p.6.)

Advertising for the Debt-Relief Services

28. SFS used mailers to advertise debt-consolidation loans. Many of the mailers were sent by a tribally affiliated entity, MEC Distribution, LLC, that operates through the use of several trade names.

29. According to its website, MEC Distribution, LLC (MEC Distribution) purports to be owned and operated by the Mandan, Hidatsa, and Arikara tribes (MHA Nation), also known as the Three Affiliated Tribes, of the Fort Berthold Reservation, and its principal place of business is 3949 Hwy 8, Suite 109, New Town, ND 58763. (Exhibit 22, p. 19.) MEC Distribution is also part of Mandaree Enterprises, LLC, a tribally-owned holding company founded in 1990 as a business arm of the MHA Nation. According to its website, MEC Distribution offers a variety of business operation services, including appointment scheduling, procurement, digital sign advertising, e-commerce, lead generation, access control, and training support. (Exhibit 22, pp. 21-22.)

30. According to the Hanson Declaration, Valley Bank records show that in between January 2017 and March 2021, Versara Lending, LLC paid over \$135 million to Mandaree Enterprises, LLC and Dae Sung, LLC (Dae Sung). (Hanson Declaration, ¶ 31.)

31. On December 29, 2023, I printed the Dae Sung website that shows an affiliation between Dae Sung, LLC and Mandaree Enterprises, LLC (n/k/a Midi Enterprises). According to the Dae Sung website, the company “belongs to the award-winning Midi Enterprises family of companies. We are proudly owned and operated by the MHA Nation.” (Exhibit 22, p. 1.)

32. On December 29, 2023, I printed information from the North Dakota Secretary of State website related to Mandaree Enterprises, LLC (Mandaree Enterprises). According to these documents, Mandaree Enterprises is a North Dakota limited liability company established on July 15, 2016. The company amended its Certificate of Authority on or about June 28, 2021, to change its name to Midi Enterprises, LLC. (Exhibit 22, pp. 3-4.)

33. On December 29, 2023, I printed information from the Illinois Secretary of State website related to Dae Sung, LLC (Dae Sung). According to these documents, Dae Sung is an Illinois limited liability company organized on April 8, 2011. The company's status in Illinois is listed as active. (Exhibit 22, p. 2.)

34. I reviewed the MEC Distribution Better Business Bureau profile (MEC Distribution BBB Profile) that lists 12 Alternate Business Names for MEC Distribution. The MEC Distribution BBB Profile also lists Sinew Management Group LLC (Sinew Management Group), as a related business. (Exhibit 27, p. 1.)

35. On December 28, 2023, I searched the North Dakota Secretary of State website and identified the following 14 trade names affiliated with MEC Distribution or Sinew Management Group, including 11 of the Alternative Business Names listed on the MEC Distribution BBB Profile:

- Bridgeline Funding;
- Broadstar Financial;
- Continental Lending;
- Crestmont Funding;
- Doublestar Financial;
- Graphite Funding;

- Guardian Angel Funding;
- Lafayette Funding;
- Patriot Funding;
- Pebblestone Financial;
- Salvation Funding;
- Sovereign Funding;
- Stallion Lending;
- Sussex Funding; and
- Tweed Lending.

(Exhibit 22, pp. 5-18.) I could not find Lafayette Funding on the North Dakota Secretary of State website.

36. The MEC BBB Profile includes the following website addresses:

- crestmontfunding.com;
- broadstarfinancial.com;
- bridgelinefunding.com
- broadstarfinancial.org;
- pebblestonefinancial.com;
- lafayettefunding.com;
- guardianangelfunding.com;
- salvationfunding.com; and
- graphitefunding.com.

(Exhibit 27, p. 1.)

37. I reviewed some consumer complaints in the Consumer Financial Protection Bureau’s Consumer Complaint Database related to the Corporate Defendants or the Façade Firms, on one hand, and the MEC Distribution trade names, on the other hand. Some of the consumer complaints included mailers using trade names of MEC Distribution, LLC. According to my review of the consumer complaints and attached mailers:

- a. MEC Distribution, LLC appears to provide lead-generation services to debt-relief companies using some of the trade names listed on the BBB website.
- b. The mailers often include the websites that are listed on the MEC BBB Profile.
- c. The mailers often include an offer letter that frequently shows the consumer as pre-approved for a “Debt Consolidation Loan” with a markedly lower interest rate than what the consumer currently has through their credit card debt.

Exhibit 23 includes examples of some of the mailers and offer letters that consumers received.

Consumer Complaint Review

38. Over the course of this investigation, I accessed the complaint section of the FTC Consumer Sentinel Network (Sentinel). Sentinel provides law enforcement members with access to millions of fraud and identity theft consumer complaints. Sentinel allows law enforcement members access to consumer complaints submitted to

the Federal Trade Commission, and complaints from data contributors, including the Bureau, State Attorneys General, and the North American Better Business Bureaus.

39. On December 6, 2023, and December 27, 2023, I searched Sentinel for complaints filed against the Façade Firms. I identified over 2,000 fraud complaints in the Sentinel database related to these entities. These complaints were filed between August 25, 2016, and December 8, 2023.

40. To determine the number of consumers who filed a complaint related to each identified Façade Firm, I reviewed the complaint information including the comments or narratives and the identifiable information related to each consumer. During my review, I found that some of the consumers filed more than one complaint and some of the complaints did not relate to debt relief, or debt-consolidation products offered by Corporate Defendants. Therefore, to determine the specific counts found in Table 5, I combined all duplicate representations of the consumers using each consumer's first and last name, as well as address, city, state, and email address, and I combined the consumer's comments or narratives as a single representation of the specific consumer's complaint. As a result, if a consumer filed more than one complaint, I coded the consumer only once. I also removed the complaints that I thought did not include information about debt relief or debt consolidation.

41. After completing the process identified in paragraph 40, above, I found that approximately 1,460 consumers filed complaints from August 25, 2016, to December 8, 2023. Approximately 125 of these consumers filed complaints in 2023. In total, I reviewed approximately 925 consumer complaints.

42. I also reviewed some consumer complaints in the Consumer Financial Protection Bureau's Consumer Complaint Database related to the Corporate Defendants and the Façade Firms.

43. From 2017 through late 2023, some consumers filed complaints indicating that, when they called the phone numbers listed on the mailers, they were told that they were not actually eligible for the advertised loans; and some were instead steered towards debt-relief services.

44. During the investigation, I talked to a former employee. According to this former employee, after the initial call with the consumer, SFS employees were expected to pull the consumer's credit information and send it to the lending department to see if they qualified for a loan. Most of the applicants did not qualify for a loan. At this point, according to the former employee, SFS employees were told to steer consumers to enroll in the debt-relief services.

Consumers' experiences after enrolling in the debt-relief service

45. Through my review of consumer complaints, consumers indicated that after enrolling in the debt-relief services:

- a. Many consumers were told to stop paying their debts.
- b. Some consumers stated that when they stopped paying their debts, their creditors added interest and fees to their account balances; and many consumers indicated that creditors filed debt-collection lawsuits against them;
- c. Several consumers stated that their creditors were never contacted by the Façade Firm or anyone else connected with the debt-relief services;

- d. Many consumers indicated that they paid into the escrow account for months before the Façade Firm reached a settlement with any of their creditors; and
- e. Many consumers stated that because of enrolling in the debt relief services provided by the Defendants, their credit decreased significantly.

46. Some consumers complained that, when they canceled the debt-relief service, they were told that either none of the funds in their escrow account or only a small amount of those funds could be returned to them because the remainder were set aside for fees (even if the funds were still in the escrow account). But at least some of the enrollment documents that consumers signed noted that certain “funds will remain under [the consumer’s] control at all times and may be freely removed by [the consumer] at any time.” Also, the Global Dedicated Account Agreement and Application, includes “the Account, when established in accordance with this Agreement, will be my sole [the consumer’s] and exclusive property... that only I [the consumer] may withdraw funds from and/or close my account at any time...” (E.B. Declaration Ex. 1.)

47. According to the Cohen Declaration, between January 1, 2016 and March 15, 2021, Defendants collected over \$84,000,000 in unlawful fees from consumers through these schemes. (Cohen Declaration ¶ 28.)

Connections to Legal Helpers Debt Resolution, LLC
and The Mortgage Law Group

48. Corporate Defendants have prior connections to entities that charged illegal advance fees.

49. In March 2011, the Illinois Attorney General sued Legal Helpers Debt Resolution, LLC for, *inter alia*, charging illegal advance fees and the company agreed to stop doing business in Illinois. (Exhibit 31). The company filed for bankruptcy in September 2014, *In re Legal Helpers Debt Resolution, LLC*, No. 1:14-bk-35193 (Bankr. N. D. Ill. 2014).

50. According to records that I reviewed from the Wyoming and New York Attorney General Offices, Sasson is a former employee of Legal Helpers Debt Resolution, LLC. (Exhibit 13, 104-08). Further, based on JPMorgan Chase records that I reviewed, I saw that Sasson was listed as a signer on the Legal Helpers Debt Resolution LLC JPMorgan Chase account, at or around April 12, 2012. (Exhibit 15, pp. 31-32). Blust formerly worked as an attorney with Legal Helpers Debt Resolution, LLC. (Exhibit 13, pp. 109-114).

51. In October 2010, LHDR Help, LLC (LHDR Help) was organized in Delaware, and Sasson was the President of the company since inception. (Exhibit 8, p. 53). LHDR Help, LLC referred clients to Legal Helpers and Credit Advocates Law Firm, LLC. (Exhibit 8, pp. 12-15). Blumkin is a former Vice President of Sales with LHDR Help Helpers. (Exhibit 8, pp. 7-10, 15). In addition, between late 2010 and early 2011, according to records from JPMorgan Chase, a bank account for Legal Helpers Tax and Financial, LLP was may have transferred to Lighthouse Tax and Financial LLP, a

company owned by Blust (Exhibit 14, p. 33) (Exhibit 15, pp. 33-34). Records from Global show that Sasson and Blumkin were contacts for LHDR Help. (Exhibit 30, pp. 1-2).

52. Duke Enterprises, LLC, Blaise Investments, LLC, and Twist Financial, LLC were members of LHDR Help. (Exhibit 8, p. 53).

53. The Mortgage Law Group (TMLG) was a mortgage-modification business that the Bureau sued in 2014 for charging advance fees. After a trial, the court held that TMLG and several affiliated individuals violated the law by, *inter alia*, charging illegal advance fees. *Consumer Fin. Prot. Bureau v. The Mortg. Law Grp., et al.*, Case No. 14-cv-513-WMC (W.D. Wis.). A document I reviewed from the litigation shows that Blust was involved with TMLG. (Exhibit 24.)

Defendants' practices are evolving

54. I reviewed recent consumer complaints using Consumer Sentinel and the Bureau's Consumer Complaint Database. In 2023 alone, 125 complaints against SFS-related entities have been filed in the Consumer Sentinel database.

55. Complaints from Consumer Sentinel and the Bureau's Consumer Complaint Database suggest SFS, working through the Façade Firms, continues to collect fees before resolving any debt for consumers.

- a. Some consumers who were enrolled in the program for more than two years were still paying monthly fees in 2023. They stated, generally, that their credit score declined, they had been sued by their creditors, and they paid more than they expected in fees;

- For example, one consumer, complained that he was charged nearly \$10,000 in fees between July 2020 and June 2023, and none of his debts were settled;
- b. Some consumers who enrolled within the last three years stated that they were in the program for a year and then received an offer for a loan from Versara Lending, LLC to pay off the amounts of outstanding debt that remained in the program.

56. Based on Defendants' practice of regularly changing company names or establishing new entities, there may be additional Client Services Subsidiaries and Façade Firms that have not been identified as part of the Bureau's investigation. For example:

- a. Sasson was involved in paying for registration of the websites for Atlas Debt Relief LLC (atlasdebtrelief.com), Hallock & Associates, Law Office of Melissa Michel LLC d/b/a Spring Legal (springlegallgroup.com), and Moore Legal Group, LLC d/b/a Meadowbrook Legal Group (meadowbrooklegallgroup.com), at least. (Exhibit 18, pp. 1-4).
- b. Consumer complaints against Atlas Debt Relief LLC, Law Office of Melissa Michel LLC d/b/a Spring Legal, and Moore Legal Group, LLC d/b/a Meadowbrook Legal Group, and Michel Law, LLC d/b/a Level One Law refer to Strategic Consulting, LLC. I reviewed some of the companies' responses to the consumer complaints, in the Bureau's Consumer Complaint Database, and the responses were substantially the same for at least Moore Legal Group, LLC d/b/a Meadowbrook Legal Group and

Michel Law, LLC d/b/a Level One Law, and included the following:

“matter has been resolved to the client’s satisfaction.”

57. I reviewed consumer complaints filed in 2023 against the law firms listed in Paragraph 56b that appear to be related to SFS.

- a. Some consumers noted that they spoke with representatives of Strategic Consulting, LLC about the debt-settlement products;
- b. For example, in a complaint filed on December 21, 2023, a consumer said that they talked to Strategic Consulting, Global Holdings, and Level One Law and enrolled in the debt-settlement program. The consumer also said they have been making payments to the program since December 2022, but none of their money went to paying for their debt.
- c. Some consumers indicated that they had a hard time canceling the service; and
- d. Some consumers indicated that they paid fees but the firm did not perform any services, including settling any debts.

Exhibits to this Declaration

58. During the Bureau’s investigation, which is outlined in this declaration and its attached exhibits, I reviewed the Bureau’s CIDs and responses to the CIDs and documents responsive to CIDs regarding the Defendants.

59. On or about September 11, 2023, the Bureau issued a CID to Key Bank requesting information about select account holders from January 1, 2016 to September 1, 2023. Between October 5, 2023 and January 3, 2024, Key Bank produced responsive documents Bates stamped KB00000001 through KB00010135. **Exhibit 2** contains

selected documents produced by Key Bank in response to the September 11, 2023 CID issued by the Bureau.

60. On or about December 14, 2022, the Bureau issued a CID to Bank of America requesting information about select account holders from January 1, 2016 to December 14, 2022. Between January 17, 2023 and May 8, 2023, Bank of America produced documents responsive to the December 14, 2022 CID, which were Bates stamped BANA-CFPB-STRATEGICFINANCIAL-000001 through BANA-CFPB-STRATEGICFINANCIAL-065937. On or about May 25, 2023, Bank of America produced additional documents responsive to the December 14, 2022 CID, which were Bates stamped BANA-CFPB-STRATEGICFINANCIAL-065944 through BANA-CFPB-STRATEGICFINANCIAL-129491. On or about August 1, 2023, the Bureau issued a second CID to Bank of America, requesting information about select account holders from January 1, 2016 to June 1, 2023. On or about September 22, 2023, Bank of America produced documents responsive to the August 1, 2023 CID, which were Bates stamped BANA-CFPB-STRATEGICFINANCIAL-129492 through BANA-CFPB-STRATEGICFINANCIAL-140869. **Exhibit 3** contains selected documents produced by Bank of America in response to the December 14, 2022 and August 1, 2023 CIDs issued by the Bureau.

61. On or about October 12, 2022, the Bureau issued a CID to Valley National Bank requesting information about select account holders from January 1, 2016 to October 5, 2022. On or about November 16, 2022, Valley National Bank produced responsive documents which the Bureau Bates stamped T-039015-00000001 through T-039015-00022323. **Exhibit 4** contains selected documents produced by Valley National Bank in response to the October 12, 2022 CID issued by the Bureau.

62. On or about November 29, 2021, the Bureau issued a CID to Associated Bank, NA requesting information about select account holders from July 21, 2011 until the date of full and complete compliance with the CID. On or about December 21, 2021, Associated Bank, NA produced documents responsive to the November 29, 2021 CID Bates stamped ASSOCIATEDBANK_00001 through ASSOCIATEDBANK_00209. On or about April 4, 2022, the Bureau issued a second CID to Associated Bank, NA, requesting information about select account holders from January 1, 2016 to April 1, 2022. On or about May 24, 2022, Associated Bank, NA produced documents responsive to the April 4, 2022 CID, which were Bates stamped by the Bureau T-035063-00000001 through T-035063-00011877.

63. On or about September 15, 2022, the Bureau sent an email to counsel for Associated Bank, NA, requesting additional information about select account holders. On or about September 27, 2022, Associated Bank, NA produced documents responsive to the September 15, 2022 request, which were Bates stamped by the Bureau T-037680-00000001 through T-037680-00000537. On or about August 14, 2023, the Bureau issued a third CID to Associated Bank, NA, requesting information about select account holders from January 1, 2016 to July 1, 2023. On or about November 1, 2023, Associated Bank, NA produced documents responsive to the August 14, 2023 CID Bates stamped ASSOCIATEDBANK_2023_000010 through ASSOCIATEDBANK_2023_001884. **Exhibit 14** contains selected documents produced by Associated Bank, NA in response to the requests made by the Bureau on or about November 20, 2021, May 24, 2022, September 15, 2022, and August 14, 2023.

64. On or about July 19, 2019 the Bureau issued a CID to RAM Payments, LLC requesting information about debt relief service providers from January 1, 2016 to until the dates the CIDs were issued. On, or about, September 4, 2019 through October 9, 2019, RAM Payments, LLC produced responsive documents Bates stamped RAM_7.25.19_000001 through RAM_7.25.19_000109; and Bureau Bates stamped documents: R-015112-00000003 through R-015112-00000008; R-015515-00000002 through R-015515-00000007; and R-015822-00000004 through R-015822-00000010.

65. On November 13, 2019 the Bureau issued a second CID to RAM Payment, LLC, requesting information about debt relief service providers from January 1, 2016 until the date that the CID was issued. On or about December 19, 2019 through November 11, 2020, RAM Payments, LLC produced responsive documents Bates stamped RAM_11.13.19_CID_000107 through RAM_11.13.19_CID_084138; and Bureau Bates stamped documents R-017171-00000004 through R-017171-00000018; R-017667-00000003 through R-017667-00000008; R-017667-00000011; R-018744-00000006 through R-018744-00000009; o-R-018697-00000003; o-R-018978-00000004; o-R-019228-00000010; o-R-019470-00000007 through o-R-019470-00000009; o-R-022738-00000001 through o-R-022738-00000002.

66. On December 4, 2020 the Bureau issued a third CID to RAM Payment, LLC, requesting information about debt relief service providers from January 1, 2016 to the date the CID was issued. On or about January 8, 2021, RAM Payments, LLC produced responsive documents Bates stamped RAM_12.4.20_CID_000004 through RAM_12.4.20_CID_014909; and Bureau Bates stamped documents o-R-024159-00000003 through o-R-024159-00000009 in response to the Bureau's requests.

67. On or about March 23, 2021, the Bureau sent a letter to RAM Payments, LLC, requesting additional transactional data. On or about April 14, 2021 and April 22, 2021, RAM Payment, LLC produced responsive documents that the Bureau Bates stamped o-R-026348-00000011 through o-R-026348-00000017; and o-R-026549-00000005 through o-R-026549-00000010. **Exhibit 16** contains selected documents produced by RAM Payments, LLC in response to the requests made by the Bureau on or about July 19, 2019, November 13, 2019, December 4, 2020, and March 23, 2021.

68. [Intentionally left blank.]

69. [Intentionally left blank.]

70. On or about December 20, 2022, the Bureau issued a CID to GoDaddy.com, LLC, requesting registration and other information concerning the Corporate Defendants and Façade Firms listed in Table 3, and other potentially related persons from January 1, 2016 to December 1, 2022. On or about February 9, 2023, GoDaddy.com, LLC produced responsive documents Bates stamped GD 000001 through GD 014477. **Exhibit 18** contains selected documents produced by GoDaddy.com, LLC in response to the December 20, 2022 CID issued by the Bureau.

71. On April 4, 2022, the Bureau issued a CID to JPMorgan Chase & Co. requesting information about select account holders from July 21, 2011 until April 1, 2022. The Bureau withdrew that CID on June 21, 2022. On June 21, 2022, the Bureau issued a second CID to JPMorgan Chase & Co. requesting information about select account holders from July 21, 2011 until April 1, 2022. On or about August 26, 2022,

JPMorgan Chase & Co. produced documents responsive to the June 21, 2022 CID which were Bates stamped by the Bureau T-040884-00000001 through T-040884-00066612. On January 26, 2023, the Bureau issued a third CID to JPMorgan Chase & Co. requesting information about select account holders from July 21, 2011 until April 1, 2022. On or about February 27, 2023, JPMorgan Chase & Co. produced documents responsive to the January 26, 2023 CID which were Bates stamped by the Bureau T-041487-00000001 through T-041487-00015301. On August 15, 2023, the Bureau issued a fourth CID to JPMorgan Chase & Co. requesting information about select account holders from January 1, 2016 until July 1, 2023. On or about November 2, 2023, JPMorgan Chase & Co. produced documents responsive to the August 15, 2023 CID which were Bates stamped by the Bureau T-045601-00000001 through T-045601-00039176. **Exhibit 15** contains selected documents produced by JPMorgan Chase & Co. in response to the Bureau's CIDs dated June 21, 2022, January 26, 2023, and August 15, 2023.

72. CID responses are too voluminous to be included as Exhibits, and so I have only included selected documents and summary tables related to the CID responses. Upon request, these records will be made available to the Court.

73. On June 8, 2023 and August 22, 2023, Bureau staff sent call recordings to Heritage Reporting Corporation to be transcribed. Copies of the three transcripts produced by Heritage from those calls are attached as **Exhibit 26**.

74. The Bureau received documents from the Minnesota Attorney General's Office, the New York Attorney General's Office, the North Carolina Attorney General's Office and the Wisconsin Attorney General's Office. (Romanoff declaration; Davis declaration; Weaver declaration; Phifer declaration Jan. 2, 2024). **Exhibits 17, 8, 5,**

and 25, contain selected documents produced by the respective Attorney General's Office are too voluminous to be included as Exhibits, and so I have only included selected documents related to the state attorney general documents. Upon request, these records will be made available to the Court.

75. On October 27, 2022, the Wisconsin Attorney General's Office sent the Bureau the transcript of the October 20, 2022 Investigational Interview of Steven Pavlow. A copy of the transcript is attached. (Exhibit 25 pp. 1-21).

76. In accordance with privacy policies of the Court and the Bureau, Plaintiff Consumer Financial Protection Bureau's Exhibits have been redacted to protect Personally Identifiable Information (PII).

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 9, 2024 in Washington, D.C.

Theresa Ridder

Table 1 Corporate Subsidiary Summary Chart				
Exhibit and Document Details	Parent	Direct Subsidiaries of Strategic Family, Inc.	Direct Subsidiaries of StratFS, LLC	Direct Subsidiaries of StratFS, LLC, Client Services Subsidiaries
KeyBank Records, Exhibit 2, p. 15 As of January 1, 2017	Strategic Family, Inc.	Strategic Financial Solutions, LLC (n/k/a StratFS, LLC) Fusion Client Services, LLC*	Strategic Client Support, LLC Strategic Consulting, LLC Strategic CS, LLC Strategic FS Buffalo, LLC Strategic NYC, LLC BCF Capital, LLC T Fin, LLC Atlas Client Services, LLC Atlas Debt Relief, LLC Gramercy Insurance, Inc.	Anchor Client Services, LLC Boulder Client Services, LLC Pioneer Client Servicing, LLC Harbor Client Services, LLC Bedrock Client Services, LLC Royal Client Services, LLC Rockwell Client Services, LLC Stonepoint Client Services, LLC Canyon Client Services LLC
Bank of America Records, Exhibit 3, p. 7 As of December 31, 2018	Strategic Family, Inc.	Listed as Subsidiaries Strategic Financial Solutions, LLC (n/k/a StratFS, LLC) Strategic CS, Inc. Peerform, Inc. BCF Capital, LLC Fusion Client Services, LLC Versara Lending, LLC Valued Credit, LLC Strategic Client Support, LLC Strategic Client Services, LLC Strategic Consulting, LLC Strategic CS, LLC T Fin, LLC Timberline Financial, LLC Atlas Client Services, LLC Atlas Debt Relief, LLC Timberline Loans, LLC Strategic LD, LLC Strategic FS Buffalo, LLC Strategic NYC, LLC		Listed as Subsidiaries, Client Services Subsidiaries Pioneer Client Servicing, LLC Bedrock Client Services, LLC Harbor Client Services, LLC Boulder Client Services, LLC Anchor Client Services, LLC Stonepoint Client Services, LLC Rockwell Client Services, LLC Royal Client Services, LLC Canyon Client Services, LLC Great Lakes Client Services, LLC Summit Client Services LLC Heartland Client Services, LLC Carolina Client Services, LLC Whitestone Client Services, LLC
KeyBank Records, Exhibit 2, pp. 15-23 As of June 15, 2020	Strategic Family, Inc.	Direct Subsidiaries of Strategic Family, Inc. Strategic Financial Solutions, LLC (n/k/a StratFS, LLC)	Direct Subsidiaries of StratFS, LLC Atlas Client Services, LLC T Fin, LLC Atlas Debt Relief, LLC BCF Capital, LLC Timberline Financial, LLC Strategic FS Buffalo, LLC Strategic NYC, LLC Strategic CS, Inc. Gardner Client Services, LLC Chinn Client Services, LLC Spring Client Services, LLC Gramercy Insurance, Inc. Gramercy Insurance, Inc. 2 of Contego Insurance Inc.	Direct Subsidiaries of StratFS, LLC, Client Services Subsidiaries Bedrock Client Services, LLC Anchor Client Services, LLC Boulder Client Services, LLC Pioneer Client Servicing, LLC Harbor Client Services, LLC Royal Client Services, LLC Rockwell Client Services, LLC Stonepoint Client Services, LLC Canyon Client Services, LLC Carolina Client Services, LLC Summit Client Services LLC Great Lakes Client Services, LLC Heartland Client Services, LLC Whitestone Client Services, LLC Option 1 Client Services, LLC Monarch Client Services, LLC Northstar Client Services, LLC Newport Client Services, LLC

*Versara Lending is listed as a direct subsidiary of Fusion Client Services, LLC
Client Services Subsidiaries that are highlighted in green are new subsidiaries for the listed time period.

Façade Firm Name	Formerly Known As	Fictitious Name/Trade Name/ d/b/a	State Organized	Formation Date	Status (As of Dec. 2023)	Foreign Registration, if Known	Façade Firms Common Affiliation
Anchor Law Firm, PLLC			Arkansas	12/3/2015	Good Standing	New Hampshire	Thomas Rogus is listed as a Manager and Timothy Burnette is listed as an authorized representative for the company in New Hampshire.
A. Florio & Associates, PLLC d/b/a Bedrock Legal Group f/k/a Raggio & Associates, PLLC	Raggio & Associates, PLLC	Bedrock Legal Group	Texas	10/31/2016	Active		James Agosto, Officer in Texas Franchise Tax, Public Information Reports for 2018 - 2022.
Boulder Legal Group, LLC			Missouri	9/13/2015	Active		
JMS Industries, LLC		Canyon Legal Group, LLC	Indiana	4/3/2017	Active		Richard Kerr Gustafson II, Manager of the company; 2021/2022 and 2023/2024 Business Reports signed by Timothy Burnette, as an Authorized Agent
Daniel Ruffy Legal, PLLC	Meg Sohmer Wood, PLLC	Carolina Legal Services	North Carolina	2/22/2018	Active		
Great Lakes Law Firm, LLC			Wisconsin	2/26/2018	Active		
The Brian A Moore Law Firm LLC		Guidestone Law Group	Georgia	3/13/2018	Active		Timothy Burnette signed as the Authorized Person for the company's Annual Registration and Amended Registration dated January 28, 2023.
Harbor Legal Group, LLC, f/k/a Atlas Law Group, LLC	G. Anthony Yuthas, LLC; The Atlas Law Group, LLC		Colorado	12/12/2013	Good Standing		Timothy Burnette filed the November 27, 2017, Periodic Report for the company, as a company agent.
Harbor Legal Group, LLC			Illinois	5/10/2021	Active		Timothy Burnette listed as organizer on the articles of organization, and is currently the registered agent for the company.
Henry Legal Group, PLLC d/b/a Heartland Legal Group		Heartland Legal Group	Michigan	3/3/2018			2019, 2020, 2021, 2022 Annual reports were signed by Timothy Burnette, as an authorized agent. The Certificate of Assumed Name, signed by Timothy Burnette, as an authorized agent.
Burnette Legal Group, LLC d/b/a Monarch Legal Group		Monarch Legal Group	Illinois	11/29/2018	Not in good standing		Timothy Burnette is the registered agent and manager of the company.
Greene Legal Group, LLC d/b/a Newport Legal Group		Newport Legal Group	Massachusetts	10/9/2019	Administratively not in good standing		Timothy Burnette signed as an agent, and authorized signatory, for the company's 2020, 2021, and 2022 Annual Reports.
Northstar Legal Group LLC			Minnesota	1/28/2019			Mercedes Gustafson organized the company and Timothy Burnette is listed as the contact person for the company.
Gardner Legal LLC d/b/a Option 1 Legal		Option 1 Legal	Maryland	3/22/2018	Active		
Pioneer Law Firm, P.C. f/k/a John B Dougherty P.C.	John B. Dougherty P.C.		Colorado	4/29/2008	Good Standing		Timothy Burnette filed company's periodic reports for 2017, 2018, 2019, 2020, 2021, and 2022.
Hodyno & Associates, PLLC d/b/a Rockwell Legal Group		Rockwell Legal Group	Arizona	4/3/2017	Active	Ohio	Timothy Burnette signed the company's May 24, 2021, Articles of Amendment as an Authorized Representative. Timothy Burnette signed the company's Registration of a Foreign Limited Liability Company in Ohio, as an authorized representative.
Royal Legal Group, LLC			Kansas	11/7/2016	Active and in Good Standing		Timothy Burnette signed the company's 2017 annual report as a member and the 2019 annual report as an authorized person. Richard Gustafson signed the company's 2022 Limited Liability Company Annual Report on or about May 31, 2023.
Donald Norris Associates PLLC d/b/a Stonepoint Legal Group, LLC		Stonepoint Legal Group	Nevada	11/30/2016	Active		Richard Gustafson is a managing member of the company, as of September 20, 2022. Timothy Burnette's name appears as the "Attorney in Fact" for the company's assumed business name filing in Montana.
WyoLaw, LLC d/b/a Summit Law Firm		Summit Law Firm	Wyoming	10/31/2017	Active	Florida	Timothy Burnette signed the company's Wyoming 2018 through 2023, Limited Liability Company Annual Reports. Timothy Burnette is listed as the contact person for the company's Application by Foreign LLC for Authorization to Transact Business in Florida.
The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Legal Group		Whitestone Legal Group	California	2/1/2019	Active		

Table 3
Façade Firm Websites, GoDaddy.com Documents & Information

Façade Firm	Domain	Created	Expires	Order ID	Legal Receipt(s) Showing Payments Made by SFS Representative	Sasson Name and/or Email Appears in the Façade Firm Legal Receipt(s)	Bates Numbers
Anchor Law Firm, PLLC	anchorlawfirm.com	9/23/2014	9/23/2023	738611852	9/24/2016; 9/24/2017; 9/24/2018; 9/24/2019; 2019, 9/24/2020; 9/24/2021; 9/24/2022	Sasson's name appears: GD 010963, invoice dated 9/24/2016; GD 010932, invoice dated 9/24/2017; GD 010898, invoice dated 9/24/2018; GD 010856, invoice dated 9/24/2019; GD 010809, invoice dated 9/24/2020; GD 010745, invoice dated 9/24/2021	GD 000711 - 714; GD 000907 - 912; GD 001127; GD 001135; GD 001147; GD 001161; GD 001173; GD 001178; GD 001181; GD 001188; GD 001112; GD 010700; GD 010745; GD 10809; GD 010856; GD 010932; GD 010963
A. Florio & Associates, PLLC d/b/a Bedrock Legal Group f/k/a Raggio & Associates, PLLC	bedrocklegal.com	9/9/2016	9/9/2025	1.025E+09	9/10/2019; 9/10/2022;	Sasson's name appears GD 010857, invoice dated 9/10/2019	GD 000711 - 714; GD 000941 - 947; GD 001148; GD 001178; GD 001180; GD 001189; GD 001229; GD 001113; GD 010701; GD 010857; GD 010964
Boulder Legal Group, LLC	boulderlegalgroup.com	8/13/2015	8/13/2023	862591138	8/14/2017; 8/14/2019; 8/14/2021;	Sasson's name appears: GD 010934, invoice dated 8/14/2017; GD010860, invoice dated 8/14/2019; GD 010749, invoice dated 8/14/2021	GD 000711 - 714; GD 000929 - 934; GD 001128; GD 001148; GD 001174; GD 001177; GD 001181; GD 010749 - 750; GD 010860 - 61; GD 010934 - 35
JMS Industries, LLC d/b/a Canyon Legal Group, LLC	canyonlegalgroup.com	1/17/2018	1/17/2024	1.255E+09	1/24/2018; 1/20/2020; 1/18/2022	Sasson's name appears: GD 010921, invoice dated 1/24/2018; GD 010834, invoice dated 1/20/2020	GD 000711 - 714; GD 000998 - 1003; GD 010727; GD 010834; GD 010921
Daniel Ruffy Legal d/b/a Carolina Legal Services	carolinalegalservices.com	12/5/2002	12/5/2023	1.293E+09	4/12/2018; 12/06/2020 4/13/2021	Sasson's name appears: GD 010911, invoice dated 4/12/2018; GD 010797, invoice dated 12/06/2020	GD 000711 - 714; GD 000715 - 720; GD 001123; GD 001132; GD 001133; GD 001144; GD 001165; GD 010735; GD 010842; GD 010911 - 13
Great Lakes Law Firm, LLC	greatlakeslf.com	4/12/2018	4/12/2024	1.293E+09	4/12/2018; 4/13/2021	Sasson's name appears: GD 010914, invoice dated 4/12/2018; GD 010773, invoice dated 4/13/2021	GD 000711 - 714; GD 001015 - 1020; GD 001165; GD 001015 - GD 001020; GD 001130; GD 010773; GD 010914
The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group	guidestonelawgroup.com	10/25/2020	10/25/2023	1.828E+09	10/26/2021; 2/25/2021; 10/26/2022	Sasson's name appears GD 010784, invoice dated 2/25/2021	GD 000711 - 714; GD 001086 - 1091; GD 001086 - GD 001091; GD 001110; GD 001124; GD 001131; GD 010740; GD 010784
Harbor Legal Group, LLC, f/k/a Atlas Law Group, LLC (organized in Colorado); Harbor Legal Group, LLC (organized in Illinois)	harborlegalgroup.com	9/23/2014	9/23/2023	738611852	9/24/2016; 9/24/2017; 9/24/2018; 9/24/2019; 2019, 9/24/2020; 9/24/2021; 9/24/2022	Sasson's name appears: GD 010963, invoice dated 9/24/2016; GD 010932, invoice dated 9/24/2017; GD 010898, invoice dated 9/24/2018; GD 010856, invoice dated 9/24/2019; GD 010809, invoice dated 9/24/2020; GD 010745, invoice dated 9/24/2021; GD 010700, invoice dated 9/24/2022	GD 000711 - 714; GD 000913 - 918; GD 000913 - 918; GD 010743 - 44; GD 010807; GD 010855; GD 010896; GD 010898; GD 010931; GD 010961
Henry Legal Group, PLLC d/b/a Heartland Legal Group	heartlandlegalgroup.com	6/1/2018	6/1/2024	1.317E+09	6/1/2018; 6/2/2021	Sasson's name appears: GD010906 - 907, invoice dated 6/1/2018; GD 010761, invoice dated 6/2/2021	GD 000711 - 714; GD 001163; GD 001021 - 1024; GD 001129; GD 001149; GD 001163; GD 010761; GD 010906 - 7
Burnette Legal Group, LLC d/b/a Monarch Legal Group	monarchlegalgroup.com	12/11/2018	12/11/2023	1.514E+09	12/16/2019; 11/5/2021; 12/21/2021	Sasson's name appears: GD 010841, invoice dated 12/16/2019; GD 010739, invoice dated 11/5/2021; GD 010734, invoice dated 12/12/2021	GD 000711 - 714; GD 001030 - 1035; GD 001122; GD 001144; GD 1150; GD 010734; GD 010739; GD 010841
Greene Legal Group, LLC d/b/a Newport Legal Group	newportlegalgroup.com	5/19/2020	5/19/2025	1.688E+09	5/19/2020	Sasson's name appears: GD 010819, invoice dated 5/19/2020	GD 000711 - 714; GD 001076 - 1081; GD 001138; GD 010819
Northstar Legal Group, LLC	northstarlegalgroup.com	1/31/2019	1/31/2025	1.46E+09	3/19/2019; 2/5/2020	Sasson's name appears: GD 010882, invoice dated 3/12/2019; GD 010832, invoice dated 2/5/2020	GD 000711 - 714; GD 001042 - 1047; GD 001121; GD 001142; GD 001155; GD 010724; GD 010832
Gardner Legal LLC d/b/a Option 1 Legal	option1legal.com	12/20/2018	12/20/2024	1.46E+09	3/12/2019; 12/25/2020;	Sasson's name appears: GD 010881, invoice dated 3/12/2019; GD 010794, invoice dated 12/25/2020	GD 000711 - 714; GD 001133; GD 001155; GD 001036 - 1041; GD 010794; GD 010882
Pioneer Law Firm, P.C. f/k/a John B Dougherty P.C.	pioneerlawfirm.com	1/8/2013	1/8/2024	523498208	1/9/2018; 1/9/2019; 1/9/2020; 1/9/2021; 1/9/2022	Sasson's name appears: GD 010838, invoice dated 1/9/2020; GD 010792, invoice dated 1/9/2021; GD 010730, invoice dated 1/9/2022	GD 000711 - 714; GD 000844 - 849; GD 001122; GD 001132; GD 001143; GD 001157; GD 001169; GD 001177; GD 001180; GD 001185; GD 010730; GD 010792; GD 010838; GD 010887; GD 010922
Hodyno & Associates, PLLC d/b/a Rockwell Legal Group	rockwelllegalgroup.com	8/2/2017	8/2/2023	1.478E+09	8/9/2019; 8/3/2021; 8/3/2022 (GD 010706)	Sasson's name appears: GD 010862, invoice dated 8/9/2019; GD 010751, invoice dated 8/3/2021	GD 000711 - 714; GD 000992 - 997; GD 001270 - 1273; GD 001286; GD 001292; GD 001113; GD 001128; GD 001148 - 49; GD 001153; GD 010706; GD 010751; GD 010862
Royal Legal Group, LLC	royallegalgroup.com	10/31/2016	10/31/2025	1.047E+09	10/31/2016; 11/1/2019; 11/1/2022	Sasson's name appears: GD 010954 - 55, invoice dated 10/31/2016; GD 010848, invoice dated 11/1/2019	GD 000711 - 714; GD 000948 - 954; GD 001110; GD 001146; GD 001177; GD 001180; GD 001186; GD 001187; GD 001231; GD 010694 - 95; GD 010848; GD 010954 - 55
Donald Norris Associates PLLC d/b/a Stonepoint Legal Group, LLC	stonepointlegalgroup.com	2/14/2017	2/14/2023	1.082E+09	2/14/2017; 2/15/2018; 2/15/2019; 2/15/2020; 2/15/2021; 2/15/2022	Sasson's name appears: GD 010947, invoice dated 2/14/2017; GD 010830 - 31, invoice dated 2/15/2020; GD 010785 - 86, invoice dated 2/15/2021; GD 010722 - 23, invoice dated 2/15/2022	GD 000711 - 714; GD 000971 - 976; GD 001120; GD 001131; GD 001141 - 42; GD 001156 - 57; GS 001167; GD 001183 - 84; GD 010722 - 23; GD 010785 - 86; GD 010830 - 31; GD 010885 - 86; GD 010919 - 20; GD 010947 - 49
WyoLaw, LLC d/b/a Summit Law Firm	wyolawfirm.com	4/29/2019	4/29/2023	1.51E+09	5/4/2021	Sasson's name appears: GD 010766, invoice dated 5/4/2021; GD 010767, invoice dated 5/4/2021	GD 000711 - 714; GD 001130; GD 001151; GD 001467 - 68; GD 001474 - 75; GD 001494; GD 001495; GD 001053 - 1058; GD 010766 - 67
The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Legal Group	whitestonelegalgroup.com	8/23/2018	8/23/2024	1.364E+09	8/24/2020; 8/24/2022	Sasson's name appears GD 010814, invoice dated 8/24/2020	GD 000711 - 714; GD 001025 - GD 001029; GD 001113; GD 001137; GD 001161; GD 003106 - 3108; GD 010704; GD 010814

Table 4
Façade Firms Websites

Façade Firm	Website	Reference Andrew Carroll, Esq. on Website	Link to SETL	Status of Website, as of Dec. 2023
Anchor Law Firm, PLLC	anchorlawfirm.com	☑	☑	Active
A. Florio & Associates, PLLC d/b/a Bedrock Legal Group f/k/a Raggio & Associates, PLLC	bedrocklegal.com	☑	☑	Active
Boulder Legal Group, LLC	boulderlegalgroup.com	☑	☑	Active
JMS Industries, LLC d/b/a Canyon Legal Group, LLC	canyonlegalgroup.com		☑	Active
Daniel Rufty Legal d/b/a Carolina Legal Services	carolinalegalservices.com			Inactive
Great Lakes Law Firm, LLC	greatlakeslf.com			Active
The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group	guidestonelawgroup.com			Active
Harbor Legal Group, LLC, f/k/a Atlas Law Group, LLC (organized in Colorado); Harbor Legal Group, LLC (organized in Illinois)	harborlegalgroup.com	☑		Active
Henry Legal Group, PLLC d/b/a Heartland Legal Group	heartlandlegalgroup.com	☑		Active
Burnette Legal Group, LLC d/b/a Monarch Legal Group	monarchlegalgroup.com			Active
Greene Legal Group, LLC d/b/a Newport Legal Group	newportlegalgroup.com	☑	☑	Active
Northstar Legal Group, LLC	northstarlegalgroup.com		☑	Active
Gardner Legal LLC d/b/a Option 1 Legal	option1legal.com	☑	☑	Active
Pioneer Law Firm, P.C. f/k/a John B Dougherty P.C.	pioneerlawfirm.com	☑		Inactive
Hodyno & Associates, PLLC d/b/a Rockwell Legal Group	rockwelllegalgroup.com	☑	☑	Active
Royal Legal Group, LLC	royallegalgroup.com			Active
Donald Norris Associates PLLC d/b/a Stonepoint Legal Group, LLC	stonepointlegalgroup.com		☑	Active
WyoLaw, LLC d/b/a Summit Law Firm	wyolawfirm.com		☑	Active
The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Legal Group	whitestonelegalgroup.com	☑		Active

Table 5
Consumer Complaints

Façade Firm	Consumers Who Filed Complaints from 1/1/2016 to 12/28/2023*	Consumers Who Filed Complaints in 2023*
Anchor Law Firm, PLLC	16	
A. Florio & Associates, PLLC d/b/a Bedrock Legal Group f/k/a Raggio & Associates, PLLC	33	2
Boulder Legal Group, LLC	120	
JMS Industries, LLC d/b/a Canyon Legal Group, LLC	30	7
Daniel Rufty Legal d/b/a Carolina Legal Services	190	2
Great Lakes Law Firm, LLC	10	2
The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group	13	8
Harbor Legal Group, LLC, f/k/a Atlas Law Group, LLC (organized in Colorado); Harbor Legal Group, LLC (organized in Illinois)	22	2
Henry Legal Group, PLLC d/b/a Heartland Legal Group	159	25
Burnette Legal Group, LLC d/b/a Monarch Legal Group	133	29
Greene Legal Group, LLC d/b/a Newport Legal Group	28	3
Northstar Legal Group, LLC	5	4
Gardner Legal LLC d/b/a Option 1 Legal	166	13
Pioneer Law Firm, P.C. f/k/a John B Dougherty P.C.	38	
Hodyno & Associates, PLLC d/b/a Rockwell Legal Group	220	15
Royal Legal Group, LLC	6	
Donald Norris Associates PLLC d/b/a Stonepoint Legal Group, LLC	95	5
WyoLaw, LLC d/b/a Summit Law Firm	144	3
The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Legal Group	33	5
Total Complaints	1461	125

*The numbers provided are approximate numbers.